

SMITH & LOWNEY, P.L.L.C.

2317 EAST JOHN STREET
SEATTLE, WASHINGTON 98112
(206) 860-2883, FAX (206) 860-4187

RECEIVED ON:

ORC

JUN 19 2017

EPA Region 10
Office of the Regional Administrator

June 12, 2017

Via Certified Mail – Return Receipt Requested

Attorney General Jeff Sessions
U.S. Department of Justice
950 Pennsylvania Ave., N.W.
Washington, D.C. 20530-0001

Via Certified Mail – Return Receipt Requested

Attorney General – Citizen Suit Coordinator
Environmental and Natural Resources Division
Law and Policy Section
P.O. Box 7415
Ben Franklin Station
Washington, D.C. 20044-7415

Via Certified Mail – Return Receipt Requested

Administer Scott Pruitt
U.S. Environmental Protection Agency
William Jefferson Clinton Building
1200 Pennsylvania Avenue, N.W.
Mail Code 1101A
Washington, D.C. 20460

Via Certified Mail – Return Receipt Requested

Regional Acting Administrator Michelle Pirzadeh
U.S. Environmental Protection Agency, Region 10
1200 Sixth Ave., Suite 900
Seattle WA 98101


Re: *Waste Action Project v. Port of Olympia.*; W.D. Wash. No. 3:17-cv-5445

Dear Honorable Civil Servants,

Enclosed is a copy of the complaint filed Monday, June 12, 2017 in the Western District of Washington in the above-named Clean Water Act citizen suit. This notice is provided to you pursuant to 40 C.F.R. § 135.4.

Sincerely,

SMITH & LOWNEY, P.L.L.C.



By: _____

Alyssa Englebrecht

Richard Smith, WSBA #21788
Alyssa Englebrecht, WSBA # 46773
SMITH & LOWNEY, PLLC
2317 East John Street
Seattle, Washington 98112
(206) 860-2883

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

WASTE ACTION PROJECT,)	
)	
Plaintiff,)	COMPLAINT
v.)	
)	
PORT OF OLYMPIA,)	
)	
Defendant.)	
)	
)	

I. INTRODUCTION

1. This action is a citizen suit brought under Section 505 of the Clean Water Act ("CWA") as amended, 33 U.S.C. § 1365. Plaintiff Waste Action Project ("WAP"), seeks a declaratory judgment, injunctive relief, the imposition of civil penalties, and the award of costs, including attorneys' and expert witness fees, for the Port of Olympia's ("Port") repeated and ongoing violations of Sections 301(a) and 402 of the CWA, 33 U.S.C. §§ 1311(a) and 1342, and the terms and conditions of the National Pollutant Discharge Elimination System ("NPDES") permit authorizing discharges of pollutants from the Port's facility to navigable waters.

COMPLAINT - 1

SMITH & LOWNEY, P.L.L.C.
2317 EAST JOHN STREET
SEATTLE, WASHINGTON 98112
(206) 860-2883

II. JURISDICTION AND VENUE

2. The Court has subject matter jurisdiction under Section 505(a) of the CWA, 33 U.S.C. § 1365(a). The relief requested herein is authorized by 33 U.S.C. §§ 1319(d) and 1365(a).

3. In accordance with Section 505(b)(1)(A) of the CWA, 33 U.S.C. § 1365(b)(1)(A), WAP notified the Port of the Port's violations of the CWA and of WAP's intent to sue under the CWA by letter dated April 3, 2017 and postmarked April 12, 2017 ("Notice Letter"). A copy of the Notice Letter is attached to this complaint as Exhibit 1. The allegations in the Notice Letter are incorporated herein by this reference. In accordance with 33 U.S.C. § 1365(b)(1)(A) and 40 C.F.R. § 135.2(a)(1), WAP provided copies of the Notice Letter to the Port's Registered Agent, the Administrator of the United States Environmental Protection Agency ("USEPA"), the Administrator of USEPA Region 10, and the Director of the Washington Department of Ecology ("WDOE") by mailing copies to these individuals on April 7, 2017.

4. At the time of the filing of this Complaint, more than sixty (60) days have passed since the Notice Letter and copies thereof were issued in the manner described in the preceding paragraph.

5. The violations complained of in the Notice Letter are continuing or are reasonably likely to re-occur. The Port is in violation of its NPDES permit and the CWA.

6. At the time of the filing of this Complaint, neither the USEPA nor the WDOE has commenced any action constituting diligent prosecution to redress these violations.

7. The source of the violations complained of is located in Thurston County, Washington, within the Western District of Washington, and venue is therefore appropriate in

1 the Western District of Washington under Section 505(c)(1) of the CWA, 33 U.S.C. §
2 1365(c)(1).

3 **III. PARTIES**

4 8. Plaintiff, WAP, is suing on behalf of itself and its member(s). WAP is a non-
5 profit corporation organized under the laws of the State of Washington. WAP is a membership
6 organization and has at least one member who is injured by the Port's violations. WAP is
7 dedicated to protecting and preserving the environment of Washington State, especially the
8 quality of its waters.
9

10 9. Plaintiff has representational standing to bring this action. WAP's members are
11 reasonably concerned about the effects of discharges of pollutants, including stormwater from
12 The Port's facility, on aquatic species and wildlife that WAP's members observe, study, and
13 enjoy. WAP's members are further concerned about the effects of discharges from the Port's
14 facility on human health. In addition, discharges from the Port's facility lessen WAP's
15 members' aesthetic enjoyment of nearby areas. WAP has members who live, work, fish, and
16 recreate around Budd Inlet and/or the Puget Sound and are affected by the Port's discharges.
17 WAP members' concerns about the effects of the Port's discharges are aggravated by the Port's
18 failure to record and timely report information about its discharges and pollution controls. The
19 recreational, scientific, economic, aesthetic and/or health interest of WAP and its members have
20 been, are being, and will be adversely affected by the Port's violations of the CWA. The relief
21 sought in this lawsuit can redress the injuries to these interests.
22

23 10. WAP has organizational standing to bring this action. WAP has been actively
24 engaged in a variety of educational and advocacy efforts to improve water quality and to address
25 sources of water quality degradation in the waters of western Washington, including Budd Inlet
26

and/or the Puget Sound. The Port has failed to fulfill monitoring, recordkeeping, reporting and planning requirements, among others, necessary for compliance with its NPDES permit and the CWA. As a result, WAP is deprived of information necessary to properly serve its members by providing information and taking appropriate action to advance its mission. WAP's efforts to educate and advocate for greater environmental protection, and to ensure the success of environmental restoration projects implemented for the benefit of its members are also precluded. Finally, WAP and the public are deprived of information that influences members of the public to become members of WAP, thereby reducing WAP's membership numbers. Thus, WAP's organizational interests have been adversely affected by the Port's violations. These injuries are fairly traceable to the Port's violations and are redressable by the Court.

11. The Port is local government agency under the laws of the State of Washington governing ports or port districts.

12. The Port owns and operates the Port of Olympia Marine Terminal, located at or about 915 Washington Street NE, Olympia, WA 98501 (the "facility").

IV. LEGAL BACKGROUND

13. Section 301(a) of the CWA, 33 U.S.C. § 1311(a), prohibits the discharge of pollutants by any person, unless in compliance with the provisions of the CWA. Section 301(a) prohibits, inter alia, such discharges not authorized by, or in violation of, the terms of a NPDES permit issued pursuant to Section 402 of the CWA, 33 U.S.C. § 1342.

14. The State of Washington has established a federally approved state NPDES program administered by the WDOE. Wash. Rev. Code § 90.48.260; Wash. Admin. Code ch. 173-220. This program was approved by the Administrator of the USEPA pursuant to 33 U.S.C. § 1342(b).

1 15. The WDOE has repeatedly issued the Industrial Stormwater General Permit
2 ("Permit") under Section 402(a) of the CWA, 33 U.S.C. § 1342(a), most recently on October 21,
3 2009, effective January 1, 2010, modified May 16, 2012 (the "2010 Permit"), and on December
4 3, 2014, effective January 2, 2015 (the "2015 Permit"). The 2010 Permit and the 2015 Permit
5 (collectively, "the Permits") contain substantially similar requirements and authorize those that
6 obtain coverage thereunder to discharge stormwater associated with industrial activity, a
7 pollutant under the CWA, and other pollutants contained in the stormwater to the waters of the
8 State subject to certain terms and conditions.
9

10 16. The Permits impose certain terms and conditions on those covered thereby,
11 including monitoring and sampling of discharges, reporting and recordkeeping requirements, as
12 well as restrictions on the quality of stormwater discharges. To reduce and eliminate pollutant
13 concentrations in stormwater discharges, the Permits require, among other things, that permittees
14 develop and implement best management practices ("BMPs") and a Stormwater Pollution
15 Prevention Plan ("SWPPP"), and apply all known and reasonable methods of prevention,
16 control, and treatment ("AKART") to discharges. The specific terms and conditions of the
17 Permits are described in detail in the Notice Letter. See Exhibit 1.
18
19

20 V. FACTS

21 17. The Port filed applications with the WDOE for coverage under the Permits.
22 WDOE granted the Port coverage under the 2010 permit, effective January 1, 2010, under Permit
23 Number WAR001168. WDOE granted the Port coverage under the 2015 Permit under the same
24 permit number.
25

26 18. The Port's facility discharges stormwater associated with industrial activity to the
27 West Bay of Budd Inlet, part of the Puget Sound.
28

1 19. The Port's facility is engaged in industrial action and is approximately 55 acres,
2 which are primarily paved. The Port's facility has miles of stormwater collection pipes and has
3 at least two named outfalls and at least 52 unnamed discharge points that discharge stormwater
4 and other pollutants to Budd Inlet.

5 20. The Port has violated the Permits and Sections 301(a) and 402 of the CWA, 33
6 U.S.C. §§ 1311(a) and 1342, by discharging pollutants not in compliance with an NPDES
7 Permit. The Port's violations of the Permits and the CWA are set forth in sections I through XII
8 of the Notice Letter, attached hereto as Exhibit 1, and are incorporated herein by this reference.
9 In particular and among the other violations described in the Notice Letter, the Port has violated
10 the Permits by contributing to violations of water and sediment quality standards, failing to
11 implement AKART, failing to monitor discharges, failing to implement BMPs to control
12 stormwater quality, failing to timely complete adaptive management responses required by the
13 Permits, failing to timely submit complete and accurate reports, permitting illicit discharges to
14 occur, violating the right of inspection and entry to WDOE, failing to report Permit violations,
15 and failing to apply for a modification of coverage for significant process changes.

16 21. The Port has discharged stormwater containing levels of pollutants that exceed the
17 benchmark values established by the Permits from four named outfalls, A, B, C, and I, monitored
18 at monitoring points A02, I01, MH1, SB1, SW1, and TF1, including on the days on which the
19 Port collected samples with the results identified in Table 1 below:
20
21
22
23
24
25
26
27
28
29

Table 1 – Benchmark Exceedances

Quarter in which sample collected (monitoring point)	COD (Benchmark 120 mg/L)	TSS (Benchmark 100 mg/L)	Copper Concentration (Benchmark 14 ug/L)	Zinc (Benchmark 117 ug/L)	Turbidity (Benchmark 25 NTU)
1st Quarter 2011					
A02					
I01					
MH1					
SB1	870				
SW1	270				
2nd Quarter 2011					
A02					
I01					
MH1	430	110	20.8		
SB1	150				
SW1					
3rd Quarter 2011					
A02					
I01	420				
MH1	620				64.8
SB1	480			153	
SW1	420			194	36.4
4th Quarter 2011					
A02	245				
I01	1020				
MH1	277				
SB1	560				
SW1	1143	187			
1st Quarter 2012					
A02					
I01	487	287			230
MH1					28.23
SB1	610				84.7
SW1	973	495	26.6	189	308
2nd Quarter 2012					
A02					
I01	430				48.6
MH1	225				69
SB1	460				49.2
SW1	950	196.7		135.7	299.5

COMPLAINT - 7

SMITH & LOWNEY, P.L.L.C.
 2317 EAST JOHN STREET
 SEATTLE, WASHINGTON 98112
 (206) 860-2883

3rd Quarter 2012

A02

I01 730 48.9

MH1 370 28.7

SB1 470 29.1

SW1 1600 190 15 141 260

4th Quarter 2012

A02

I01 1035 165 18.6 20.25 207

MH1 475 17.8 179.65 78.8

SB1 665 131.4

SW1 1700 820 31.6 407.5 327.35

1st Quarter 2013

A02

I01 204.3 202.7 153.5

MH1 175 43

SB1 806.7 190 298.2

SW1 1210 190 145.9 227.3

2nd Quarter 2013

A02

I01 356.6 100.3

MH1 215 61.6

SB1 770 112.9

SW1 1290 258 154.2 198.8

3rd Quarter 2013

A02

I01 815 671 16 273.5 52.4

MH1 550 93.4

SB1 715 77.8

SW1 2250 300 22.5 244 366.4

4th Quarter 2013

A02

I01 1465 518 28.9 316 200

MH1 290 117.5 125.2

SB1 690 103.9

SW1 1050 290 17.5 125 384.1

1 1st Quarter 2014

A02

2 I01 244.3

3 MH1 232.7

4 SB1 931.3

5 SW1 1733.3 276.6 14.6 142.6 151.2

6 326.5

7 2nd Quarter 2014

A02

8 I01 460

9 MH1 290

10 SB1 680 130.8

11 SW1 910 37.1

12 3rd Quarter 2014

13 A02 14.5 191 33.3

14 I01 1500 226 15.1 186 208.3

15 MH1 1200 122 68.8

16 SW1 3250 501.5 39.2 407.5 364.9

17 4th Quarter 2014

A02

18 TF1 300

19 1st Quarter 2015

A02

20 TF1 256.67

21 2nd Quarter 2015

A02

22 TF1 180

23 3rd Quarter 2015

24 A02 160

25 TF1 130

26 4th Quarter 2015

A02

27 TF1 140

28 1st Quarter 2016

A02

29 TF1 270

30 2nd Quarter 2016

A02

TF1

31 3rd Quarter 2016

A02

32 TF1 310

33 4th Quarter 2016

A02

34 TF1 640

35 COMPLAINT - 9

1 1st Quarter 2017

2 A02

3 TF1

680

4 Key- A02, I01, MH1, SB1, SW1, TF1 are designations for the Port's monitoring points.

5 The Permits require the Port's monitoring to be representative of discharges from the facility.

6 The stormwater monitoring data provided in Table 1 shows benchmark exceedances included in
7 the stormwater monitoring results that the Port has submitted to the WDOE.

8 22. The West Bay of Budd Inlet is listed on Washington State's 303(d) list of
9 impaired waterbodies (i.e., waterbodies acknowledged to be in violation of specific applicable
10 water quality criteria) for multiple pollutant parameters, including dissolved oxygen, dioxin, and
11 sediment bioassay.
12

13 23. Discharges from the Port's facility contribute to the polluted conditions of the
14 waters of the State, including to the water and sediment quality impairment of Budd Inlet for
15 dissolved oxygen, dioxin, and sediment bioassay, noted in the preceding paragraph. Discharges
16 from the Port's facility contribute to the ecological impacts that result from the pollution of these
17 waters and to WAP and its members' injuries resulting therefrom. These requirements and the
18 Port's violations thereof are described in detail in section I of the Notice Letter, attached hereto
19 as Exhibit 1, and are incorporated herein by this reference
20
21

22 24. The Port's exceedances of the benchmark values indicate that the Port is failing to
23 apply AKART to its discharges and/or is failing to implement an adequate SWPPP and BMPs.
24 Upon information and belief, the Port violated the Permits by not developing, modifying, and/or
25 implementing BMPs and a SWPPP in accordance with the requirements of the Permits, and/or
26 by not applying AKART to discharges from the facility. These requirements and the Port's
27
28
29

1 violations thereof are described in detail in sections I and II of the Notice Letter, attached hereto
2 as Exhibit 1, and are incorporated herein by this reference.

3 25. The Port has violated the monitoring requirements of the Permits. The
4 monitoring requirements and the Port's violations thereof are described in section III of the
5 Notice Letter, attached hereto as Exhibit 1, and are incorporated herein by this reference.
6

7 26. The Port has not conducted and/or completed the corrective action responses as
8 required by the Permits. These requirements of the Permits and the Port's violations thereof are
9 described in section IV of the Notice Letter, attached hereto as Exhibit 1, and are incorporated
10 herein by this reference.
11

12 27. Condition S8.B of the Permits require a permittee to undertake a Level 1
13 corrective action whenever it exceeds a benchmark value identified in Condition S5. A Level 1
14 corrective action comprises review of the SWPPP to ensure permit compliance, revisions to the
15 SWPPP to include additional operational source control BMPs with the goal of achieving the
16 applicable benchmark values in future discharges, signature and certification of the revised
17 SWPPP, summary of the Level 1 corrective action in the annual report, and full implementation
18 of the revised SWPPP as soon as possible, but no later than the DMR due date for the quarter the
19 benchmark was exceeded. Condition S8.A of the 2015 Permit requires that the permittee
20 implement any Level 1 corrective action required by the 2010 Permit.
21

22 28. The Port triggered Level 1 corrective action requirements for each benchmark
23 exceedance identified in Table 1 above. The Port has violated the requirements of the Permits
24 described above by failing to conduct a Level 1 corrective action in accordance with Permit
25 conditions, including the required review, revision, and certification of the SWPPP, the required
26 implementation of additional BMPs, and the required summarization in the annual report, each
27
28

1 time during the past five years that its quarterly stormwater sampling results were greater than a
2 benchmark, including the benchmark excursions listed in Table 1 above. These corrective action
3 requirements and the Port's violations thereof are described in section IV.A of the Notice Letter,
4 attached hereto as Exhibit 1, and are incorporated herein by this reference.

5 29. Condition S8.C of the Permits require a permittee to undertake a Level 2
6 corrective action whenever it exceeds a benchmark value identified in Condition S5 during any
7 two quarters during a calendar year. A Level 2 corrective action comprises review of the
8 SWPPP to ensure permit compliance, revisions to the SWPPP to include additional structural
9 source control BMPs with the goal of achieving the applicable benchmark values in future
10 discharges, signature and certification of the revised SWPPP, summary of the Level 2 corrective
11 action in the annual report, and full implementation of the revised SWPPP as soon as possible,
12 but no later than August 31st of the year following the triggering of the Level 2 corrective action.
13 Condition S8.A of the 2015 Permit requires that the permittee implement any Level 2 corrective
14 action required by the 2010 Permit.

15 30. The Port triggered Level 2 corrective action requirements for each benchmark
16 exceedance identified in Table 1 above that occurred in any two quarters of a calendar year. The
17 Port has violated the requirements of the Permits described above by failing to conduct a Level 2
18 corrective action in accordance with Permit conditions, including the required review, revision,
19 and certification of the SWPPP, the required implementation of additional structural source
20 control BMPs, and the required summarization in the annual report, each time during the past
21 five years that its quarterly stormwater sampling results were greater than a benchmark, for any
22 two quarters during a calendar year, including the benchmark excursions listed in Table 1 above.
23 These violations include, but are not limited to, the Port's failure to fulfill these obligations for
24

1 zinc, COD, turbidity, and TSS triggered by its stormwater sampling during calendar year 2011;
 2 for zinc, COD, turbidity, TSS, and copper triggered by its stormwater sampling during calendar
 3 year 2012; for zinc, COD, turbidity, TSS, and copper triggered by its stormwater sampling
 4 during calendar year 2013; for zinc, COD, turbidity, TSS, and copper triggered by its stormwater
 5 sampling during calendar year 2014; for COD triggered by its stormwater sampling during
 6 calendar year 2015; and for COD triggered by its stormwater sampling during calendar year
 7 2016. These corrective action requirements and the Port's violations thereof are described in
 8 section IV.B of the Notice Letter, attached hereto as Exhibit 1, and are incorporated herein by
 9 this reference.
 10

11
 12 31. Condition S6.C of the Permits establishes a numeric effluent limitation for
 13 maximum daily TSS concentrations of 30 mg/L because the Port discharges to a 303(d)-listed
 14 waterbody. The Port has discharged stormwater containing levels of pollutants that exceed the
 15 numeric effluent limit for maximum daily TSS concentration established by the Permits from
 16 four named outfalls, A, B, C, and I, monitored at monitoring points A02, I01, MH1, SB1, SW1,
 17 and TF1, including the days on which the Port collected samples with the results identified in
 18 Table 2 below:
 19
 20

21 **Table 2 – Numeric Effluent Limitation Violations**

Calendar quarter including date of violation	Daily Maximum TSS concentration in mg/L (monitoring point)
1st Quarter 2012	287 (I01), 50.7 (I01), 495 (SW1)
2nd Quarter 2012	37.3 (I01), 78 (MH1), 196.7 (SW1)
3rd Quarter 2012	45 (I01), 33 (MH1), 190 (SW1)
4th Quarter 2012	62 (A02), 165 (I01), 62 (MH1), 96.5 (SB1), 820 (SW1)
1st Quarter 2013	202.7 (I01), 190 (SB1), 190 (SW1)
2nd Quarter 2013	31.1 (A02), 87.3 (I01), 54.5 (MH1), 94 (SB1), 258 (SW1)
3rd Quarter 2013	671 (I01), 71.5 (MH1), 67 (SB1), 300 (SW1)

4th Quarter 2013	518 (I01), 117.5 (MH1), 48 (SB1), 290 (SW1)
1st Quarter 2014	36 (MH1), 98 (SB1), 276.6 (SW1)
2nd Quarter 2014	90 (SB1), 31 (SW1)
3rd Quarter 2014	501.5 (SW1)
1st Quarter 2015	36.33 (TF1)
3rd Quarter 2015	33 (A02)
1st Quarter 2016	64 (TF1)
1st Quarter 2017	54 (TF1)

Key- A02, I01, MH1, SB1, SW1, TF1 are designations for The Port's monitoring points.

The exact dates of violation are known to the Port and are not accessible to WAP at this time.

These effluent limitation requirements and the Port's violations thereof are described in section VI of the Notice Letter, attached hereto as Exhibit 1, and are incorporated herein by this reference.

32. Condition S9.B of the Permits requires the Port to submit an accurate and complete annual report to WDOE no later than May 15th of each year that includes specific information. The Port has violated these requirements. The Port violated this condition by failing to include all of the required information in the annual reports it submitted for years 2012, 2013, 2014, and 2015. These annual report requirements and the Port's violations thereof are described in section V of the Notice Letter, attached hereto as Exhibit 1, and are incorporated herein by this reference.

33. Upon information and belief, the Port has failed to comply with recording and record keeping requirements of the Permits. These requirements and the Port's violations thereof are described in section IX of the Notice Letter, attached hereto as Exhibit 1, and are incorporated herein by this reference.

34. Condition S5.E of the Permits prohibits illicit discharges by the Port. The Port has violated this condition and the CWA each and every time an illicit discharge has occurred

1 during the last five years. These requirements and the Port's violations thereof are described in
2 section VII of the Notice Letter, attached hereto as Exhibit 1, and are incorporated herein by this
3 reference.

4 35. Illicit discharges by the Port are a violation of section 301 of the CWA, 33 U.S.C.
5 § 1311. The Port has violated section 301 of the CWA, 33 U.S.C. § 1311, each and every time
6 an illicit discharge has occurred during the last five years. These requirements and the Port's
7 violations thereof are described in section XII of the Notice Letter, attached hereto as Exhibit 1,
8 and are incorporated herein by this reference.
9

10 36. Condition S2.B of the Permits requires the Port to submit a complete
11 Modification of Coverage Form to WDOE when the Port anticipates a significant process
12 change, as defined by Appendix 2 of the Permits. The Port violated this condition by failing to
13 apply for modifications of coverage for two separate significant process changes at the facility.
14 These requirements and the Port's violations thereof are described in section VIII of the Notice
15 Letter, attached hereto as Exhibit 1, and are incorporated herein by this reference.
16

17 37. Condition S9.E of the Permits requires the Port to take certain actions, including
18 reporting to WDOE, in the event the Port is unable to comply with any of the terms and
19 conditions of the Permits which may endanger human health or the environment, or exceed any
20 numeric effluent limitation in the Permits. The Port violated this condition each and every time
21 The Port exceeded the numeric effluent limitation for TSS, as specified in Table 2, above; each
22 and every time the Port discharges illicit and/or non-stormwater discharges, as described in
23 paragraphs 34 and 35, above; each and every time the Port failed to comply with the corrective
24 action requirements described in paragraphs 28 and 30, above; and each and every time the Port
25 discharged stormwater with concentrations of pollutants in excess of the Permit benchmarks, as
26
27
28

1 described in Table 1, above. These requirements and the Port's violations thereof are described
2 in section X of the Notice Letter, attached hereto as Exhibit 1, and are incorporated herein by this
3 reference.

4 38. General Condition G3 of the Permits requires the Port to allow an authorized
5 representative of WDOE, upon the presentation of credentials and other such documents, to enter
6 and inspect the facility. The Port violated this condition by denying the right of entry and
7 inspection to WDOE inspectors on at least the following occasions: January 28, 2015, January
8 29, 2015, and March 31, 2016. On information and belief, the Port has also violated this
9 condition on other occasions during the past five years. These requirements and the Port's
10 violations thereof are described in section XI of the Notice Letter, attached hereto as Exhibit 1,
11 and are incorporated herein by this reference.

12 39. A significant penalty should be imposed against the Port under the penalty factors
13 set forth in 33 U.S.C. § 1319(d).

14 40. The Port's violations were avoidable had the Port been diligent in overseeing
15 facility operations and maintenance.

16 41. The Port benefited economically as a consequence of its violations and failure to
17 implement improvements at the facility.

21 VI. FIRST CAUSE OF ACTION

22 42. The preceding paragraphs and the allegations in sections I through XII of the
23 Notice Letter, attached hereto as Exhibit 1, are incorporated herein.

24 43. The Port's violations of its NPDES permits described herein and in the Notice
25 Letter constitute violations of Sections 301 and 402 of the CWA, 33 U.S.C. §§ 1311 and 1342,
26
27
28

1 and violations of “effluent standard(s) or limitation(s)” as defined by Section 505 of the CWA;
2 33 U.S.C. § 1365.

3 44. Upon information and belief, the violations committed by the Port are ongoing or
4 are reasonably likely to continue to occur. Any and all additional violations of the Permits and
5 the CWA which occur after those described in WAP’s Notice Letter but before a final decision in
6 this action should be considered continuing violations subject to this Complaint.
7

8 45. Without the imposition of appropriate civil penalties and the issuance of an
9 injunction, the Port is likely to continue to violate the Permits and the CWA to the further injury
10 of WAP, its members, and others.
11

12 VII. SECOND CAUSE OF ACTION

13 46. The preceding paragraphs and the allegations in sections I through XII of the
14 Notice Letter, attached hereto as Exhibit 1, are incorporated herein.
15

16 47. The Port’s unpermitted discharges described herein and in the Notice Letter
17 constitute violations of Sections 301(a) of the CWA, 33 U.S.C. §§ 1311(a).
18

19 48. Upon information and belief, the violations committed by the Port are ongoing or
20 are reasonably likely to continue to occur. Any and all additional violations of section 301(a) of
21 the CWA which occur after those described in WAP’s Notice Letter but before a final decision in
22 this action should be considered continuing violations subject to this Complaint.
23

24 49. Without the imposition of appropriate civil penalties and the issuance of an
25 injunction, the Port is likely to continue to violate section 301(a) of the CWA to the further
26 injury of WAP, its members, and others.
27
28
29

1 50. A copy of this Complaint will be served upon the Attorney General of the United
2 States and the Administrator of the USEPA as required by 33 U.S.C. § 1365(c)(3).

3 **VIII. RELIEF REQUESTED**

4 Wherefore, WAP respectfully requests that this Court grant the following relief:

5 A. Issue a declaratory judgment that the Port has violated and continues to be in
6 violation of the Permits and Sections 301 and 402 of the CWA, 33 U.S.C. §§ 1311 and 1342;

7 B. Enjoin the Port from operating the facility in a manner that results in further
8 violations of the Permits or the CWA;

9 C. Order the Port to immediately implement a SWPPP that is in compliance with the
10 Permits;

11 D. Order the Port to allow WAP to participate in the development and
12 implementation of the Port's SWPPP;

13 E. Order the Port to provide WAP, for a period beginning on the date of the Court's
14 Order and running for two years after the Port achieves compliance with all of the conditions of
15 the Permits, with copies of all reports and other documents which the Port submits to the USEPA
16 or to the WDOE regarding the Port's coverage under the Permit at the time those documents are
17 submitted to these agencies;

18 F. Order the Port to take specific actions to remediate the environmental harm
19 caused by its violations;

20 G. Order the Port to abate unpermitted discharges from its facility until the Port
21 obtains a permit for such discharges.

22 H. Grant such other preliminary and/or permanent injunctive relief as WAP may
23 from time to time request during the pendency of this case;

1 I. Order the Port to pay civil penalties of \$37,500.00 per day of violation for each
2 violation committed by the Port through November 2, 2015 and to pay \$52,414 per day of
3 violation for each violation committed by the Port after November 2, 2015 pursuant to Sections
4 309(d) and 505(a) of the CWA, 33 U.S.C. §§ 1319(d) and 1365(a), and 40 C.F.R. § 19 and 19.4;

5
6 J. Award WAP its litigation expenses, including reasonable attorneys' and expert
7 witness fees, as authorized by Section 505(d) of the CWA, 33 U.S.C. § 1365(d); and

8 K. Award such other relief as this Court deems appropriate.

9 RESPECTFULLY SUBMITTED this 12th day of June, 2017.

10 SMITH & LOWNEY, PLLC

11
12 By: s/Alyssa Englebrecht
13 Alyssa Englebrecht, WSBA # 46773

14 By: s/Richard Smith
15 Richard Smith, WSBA #21788

16 2317 E. John Street, Seattle, WA 98112
17 Tel: (206) 860-2883; Fax: (206) 860-4187
18 Email: richard@smithandlowney.com,
alyssa@smithandlowney.com

19 *Attorneys for Plaintiff Waste Action Project*
20
21
22
23
24
25
26
27
28
29

Exhibit 1

SMITH & LOWNEY, P.L.L.C.

2317 EAST JOHN STREET
SEATTLE, WASHINGTON 98112
(206) 860-2883, FAX (206) 860-4187

April 3, 2017

Via Certified Mail - Return Receipt Requested

Mr. Ed Galligan
Executive Director
Port of Olympia
606 Columbia St NW, Ste 300
Olympia, WA 98501

**Re: NOTICE OF INTENT TO SUE UNDER THE CLEAN WATER ACT AND
REQUEST FOR COPY OF STORMWATER POLLUTION PREVENTION
PLAN**

Dear Managing Agent:

We represent Waste Action Project, P.O. Box 9281, Covington, WA 98042, (206) 849-5927. Any response or correspondence related to this matter should be directed to us at the letterhead address. This letter is to provide you with sixty days notice of Waste Action Project's intent to file a citizen suit against the Port of Olympia under section 505 of the Clean Water Act ("CWA"), 33 USC § 1365, for the violations at the Port of Olympia Ocean Terminal described below. This letter is also a request for a copy of the complete and current stormwater pollution prevention plan ("SWPPP") required by Port of Olympia's National Pollution Discharge Elimination System ("NPDES") permit.

For its Ocean Terminal, the Port of Olympia was granted coverage on January 1, 2010 under the Washington Industrial Stormwater General Permit ("IGSP") issued by the Washington State Department of Ecology ("Ecology") on October 21, 2009, effective January 1, 2010, modified May 16, 2012, effective July 1, 2012, and set to expire on January 1, 2015, under NPDES Permit No. WAR001168 (the "2010 Permit"). Ecology granted subsequent coverage under the current iteration of the ISGP, issued by Ecology on December 3, 2014, effective January 2, 2015, and set to expire on December 31, 2019 (the "2015 Permit") and maintains the same permit number, WAR001168.

Port of Olympia has violated and continues to violate the CWA (see Sections 301 and 402 of the CWA, 33 USC §§ 1311 and 1342) and the terms and conditions of the 2010 Permit and 2015 Permit (collectively, "Permits") with respect to operations of, and discharges of stormwater and pollutants, including unpermitted discharges as described below in Section XII of this Notice of Intent to Sue, from its facility located at or about 915 Washington Street NE, Olympia, WA 98501 (the "facility") as described herein, to the West Bay of Budd Inlet, part of the Puget Sound. The facility subject to this notice includes any contiguous or adjacent properties owned or operated by Port of Olympia.

I. COMPLIANCE WITH STANDARDS.

A. Violations of Water Quality Standards.

Condition S10.A of the Permits prohibits discharges that cause or contribute to violations of water quality standards. Water quality standards are the foundation of the CWA and Washington's efforts to protect clean water. In particular, water quality standards represent the U.S. Environmental Protection Agency ("EPA") and Ecology's determination, based on scientific studies, of the thresholds at which pollution starts to cause significant adverse effects on fish or other beneficial uses. For each water body in Washington, Ecology designates the "beneficial uses" that must be protected through the adoption of water quality standards.

A discharger must comply with both narrative and numeric criteria for water quality standards. WAC 173-201A-010; WAC 173-201A-510 ("No waste discharge permit can be issued that causes or contributes to a violation of water quality criteria, except as provided for in this chapter."). Narrative water quality standards provide legal mandates that supplement the numeric criteria. Furthermore, the narrative water quality standard applies with equal force even if Ecology has established a numeric water quality standard. Specifically, Condition S10.A of the Permits requires that Port of Olympia's discharges not cause or contribute to a violation of Washington State water quality standards.

Port of Olympia discharges to the West Bay of Budd Inlet via a stormwater conveyance system, comprising collection and conveyance facilities, such as catch basins and pipes which then discharges to the Puget Sound. The West Bay of Budd Inlet does not meet water quality standards for dissolved oxygen or dioxin and is included on the state's "303(d) list" of impaired water bodies. Port of Olympia discharges stormwater that contains elevated levels of zinc, turbidity, copper, chemical oxygen demand ("COD"), and total suspended solids ("TSS") as indicated in the table of benchmark exceedances below. These discharges cause and/or contribute to violations of water quality standards (including sediment quality standards) in Budd Inlet for dissolved oxygen and turbidity, violations of the sediment management standards in Budd Inlet for sediment bioassay, violations of aquatic life criteria for Budd Inlet, violations of the secondary contact recreational criteria for Budd Inlet, violations of the wildlife habitat criteria for Budd Inlet, violations of the harvesting criteria for Budd Inlet, violations of the commerce and navigation criteria for Budd Inlet, violations of the boating criteria for Budd Inlet, as well as violations of the aesthetic criteria for Budd Inlet due to the presence of turbid and toxic discharges from the facility that offend the senses of sight, smell and touch Budd Inlet. *See* WAC 173-201A-210(1)(d), (1)(e), (1)(a)(iii), (3), (4), WAC 173-204-320(f), WAC 173-201A-240, WAC 173-201A-602, WAC 173-201A-610, WAC 173-201A-612, and WAC 173-204 Part III. These violations have occurred each and every day during the last five years on which there was 0.1 inch or more of precipitation, and continue to occur. Precipitation data from that time period is appended to this notice of intent to sue and identifies these days.

Table 1 – Benchmark Exceedances

Quarter in which sample collected (monitoring point)	COD (Benchmark 120 mg/L)	TSS (Benchmark 100 mg/L)	Copper Concentration (Benchmark 14 ug/L)	Zinc (Benchmark 117 ug/L)	Turbidity (Benchmark 25 NTU)
1st Quarter 2011					
A02*					
I01*					
MH1*					
SB1*	870				
SW1*	270				
2nd Quarter 2011					
A02					
I01					
MH1	430	110	20.8		
SB1	150				
SW1					
3rd Quarter 2011					
A02					
I01	420				
MH1	620				64.8
SB1	480			153	
SW1	420			194	36.4
4th Quarter 2011					
A02	245				
I01	1020				
MH1	277				
SB1	560				
SW1	1143	187			
1st Quarter 2012					
A02					
I01	487	287			230
MH1					28.23
SB1	610				84.7
SW1	973	495	26.6	189	308
2nd Quarter 2012					
A02					
I01	430				48.6
MH1	225				69
SB1	460				49.2
SW1	950	196.7		135.7	299.5

3rd Quarter 2012

A02					
I01	730				48.9
MH1	370				28.7
SB1	470				29.1
SW1	1600	190	15	141	260

4th Quarter 2012

A02			18.6		
I01	1035	165	20.25		207
MH1	475		17.8	179.65	78.8
SB1	665				131.4
SW1	1700	820	31.6	407.5	327.35

1st Quarter 2013

A02					
I01	204.3	202.7			153.5
MH1	175				43
SB1	806.7	190			298.2
SW1	1210	190		145.9	227.3

2nd Quarter 2013

A02					
I01	356.6				100.3
MH1	215				61.6
SB1	770				112.9
SW1	1290	258		154.2	198.8

3rd Quarter 2013

A02					
I01	815	671	16	273.5	52.4
MH1	550				93.4
SB1	715				77.8
SW1	2250	300	22.5	244	366.4

4th Quarter 2013

A02					
I01	1465	518	28.9	316	200
MH1	290	117.5			125.2
SB1	690				103.9
SW1	1050	290	17.5	125	384.1

1st Quarter 2014

A02					
I01	244.3				
MH1	232.7				
SB1	931.3				151.2
SW1	1733.3	276.6	14.6	142.6	326.5

2nd Quarter 2014

A02

I01 460

MH1 290

SB1 680 130.8

SW1 910 37.1

3rd Quarter 2014

A02 14.5 191 33.3

I01 1500 226 15.1 186 208.3

MH1

SB1 1200 122 68.8

SW1 3250 501.5 39.2 407.5 364.9

4th Quarter 2014

A02

TF1 300

1st Quarter 2015

A02

TF1 256.67

2nd Quarter 2015

A02

TF1 180

3rd Quarter 2015

A02 160

TF1 130

4th Quarter 2015

A02

TF1 140

1st Quarter 2016

A02

TF1 270

2nd Quarter 2016

A02

TF1

3rd Quarter 2016

A02

TF1 310

4th Quarter 2016

A02

TF1 640

* A02, I01, MH1, SB1, SW1, TF1 are monitoring point designations used and known by the Port.

B. Compliance with Standards.

Condition S10.C of the Permits requires Port of Olympia to apply all known and reasonable methods of prevention, control and treatment (“AKART”) to all discharges, including preparation and implementation of an adequate SWPPP and best management practices (“BMPs”). Port of Olympia has violated and continues to violate these conditions by failing to apply AKART to its discharges or to implement an adequate SWPPP and BMPs as evidenced by the elevated levels of pollutants in its discharge indicated in Table 1 above and as described below in this notice of intent to sue.

Additionally, Port of Olympia has not applied AKART to its discharges from approximately 52 wharf drains, consisting of slot drains and round ports (also known as “scuppers”), on the dock side of the Terminal in Drainage Basin A, which discharge directly to Budd Inlet. Stormwater that is discharged through these drains is not subject to source control, structural, and treatment best management practices implemented on other portions of the site.

Condition S1.A of the Permits requires that all discharges and activities authorized be consistent with the terms and conditions of the Permits. Port of Olympia has violated these conditions by discharging and acting inconsistently with the conditions of the Permits as described in this Notice of Intent to Sue.

II. STORMWATER POLLUTION PREVENTION PLAN VIOLATIONS.

The Defendant is in violation of the Permits’ SWPPP provisions as follows:

1. Condition S3.A.1 of the Permits requires Port of Olympia to develop and implement a SWPPP as specified. Condition S3.A.2 of the Permits require the SWPPP to specify BMPs necessary to provide AKART and ensure that discharges do not cause or contribute to violations of water quality standards. On information and belief, Port of Olympia has violated these requirements of the Permits each and every day during the last five years and continues to violate them as it has failed to prepare and/or implement a SWPPP that includes AKART BMPs and BMPs necessary to comply with state water quality standards.

2. Condition S3.A of the Permits requires Port of Olympia to have and implement a SWPPP that is consistent with permit requirements, fully implemented as directed by permit conditions, and updated as necessary to maintain compliance with permit conditions. On information and belief, Port of Olympia has violated these requirements of the Permits each and every day during the last five years and continues to violate them because its SWPPP is not consistent with permit requirements, has not been fully implemented and has not been updated as necessary. Port of Olympia has also failed to update its SWPPP as necessary, including in response to the facility’s significant process changes, as described below in section VIII of this Notice of Intent to Sue.

3. The SWPPP fails to satisfy the requirements of Condition S3 of the Permits because it does not adequately describe BMPs. Condition S3.B.4 of the Permits requires that the SWPPP include a description of the BMPs that are necessary for the facility to eliminate or reduce the potential to contaminate stormwater. Condition S3.A.3 of the Permits requires that the SWPPP include BMPs consistent with approved stormwater technical manuals or document how stormwater BMPs included in the SWPPP are demonstratively equivalent to the practices contained in the approved stormwater technical manuals, including the proper selection, implementation, and maintenance of all applicable and appropriate BMPs. Port of Olympia's SWPPP does not comply with these requirements because it does not adequately describe BMPs and does not include BMPs consistent with approved stormwater technical manuals nor does it include BMPs that are demonstratively equivalent to such BMPs with documentation of BMP adequacy.

4. Port of Olympia's SWPPP fails to satisfy the requirements of Condition S3.B.2 of the Permits because it fails to include a facility assessment as mandated. The SWPPP fails to include an adequate facility assessment because it does not describe the industrial activities conducted at the site, the general layout of the facility including buildings and storage of raw materials, the flow of goods and materials through the facility, regular business hours and seasonal variations in business hours or in industrial activities as required.

5. Port of Olympia's SWPPP fails to satisfy the requirements of Condition S3.B.1 of the Permits because it does not include a site map that identifies significant features, the stormwater drainage and discharge structures, the stormwater drainage areas for each stormwater discharge point off-site, a unique identifying number for each discharge point, each sampling location with a unique identifying number, paved areas and buildings, areas of pollutant contact associated with specific industrial activities, conditionally approved non-stormwater discharges, surface water locations, areas of existing and potential soil erosion, vehicle maintenance areas, and lands and waters adjacent to the site that may be helpful in identifying discharge points or drainage routes.

6. Port of Olympia's SWPPP fails to comply with Condition S3.B.2.b of the Permits because it does not include an inventory of industrial activities that identifies all areas associated with industrial activities that have been or may potentially be sources of pollutants as required. The SWPPP does not identify all areas associated with loading and unloading of dry bulk materials or liquids, outdoor storage of materials or products, outdoor manufacturing and processing, onsite dust or particulate generating processes, on-site waste treatment, storage, or disposal, vehicle and equipment fueling, maintenance, and/or cleaning, roofs or other surfaces exposed to air emissions from a manufacturing building or a process area, and roofs or other surfaces composed of materials that may be mobilized by stormwater as required by these conditions.

7. Port of Olympia's SWPPP does not comply with Condition S3.B.2.c of the Permits because it does not include an adequate inventory of materials. The SWPPP does not include an inventory of materials that lists the types of materials handled at the site that potentially may be exposed to precipitation or runoff and that could result in stormwater pollution, a short narrative for material describing the potential for the pollutants to be present

in stormwater discharge that is updated when data becomes available to verify the presence or absence of the pollutants, a narrative description of any potential sources of pollutants from past activities, materials and spills that were previously handled, treated, stored, or disposed of in a manner to allow ongoing exposure to stormwater as required. The SWPPP does not include the method and location of on-site storage or disposal of such materials and a list of significant spills and significant leaks of toxic or hazardous pollutants as these permit conditions require.

8. Port of Olympia's SWPPP does not comply with Condition S3.B.3 of the Permits because it does not identify specific individuals by name or title whose responsibilities include SWPPP development, implementation, maintenance, and modification.

9. Condition S3.B.4 of the 2010 Permit requires that permittees include in their SWPPPs and implement certain mandatory BMPs no later than July 1, 2010 unless site conditions render the BMP unnecessary, infeasible, or an alternative and equally effective BMP is provided. Port of Olympia is in violation of this requirement because it has failed to include in its SWPPP and implement the mandatory BMPs of the 2010 Permit.

10. Condition S3.B.4 of the 2015 Permit requires that permittees include in their SWPPPs and implement certain mandatory BMPs and that the permittee explain in detail how and where the selected BMPs will be implemented. Port of Olympia is in violation of this requirement because it has failed to include in its SWPPP and implement the mandatory BMPs of the 2015 Permit and has failed to explain in detail how and where these BMPs will be implemented.

11. Port of Olympia's SWPPP does not comply with Condition S3.B.4.b.i of the Permits because it does not include required operational source control BMPs in the following categories: good housekeeping (including definition of ongoing maintenance and cleanup of areas that may contribute pollutants to stormwater discharges, and a schedule/frequency for each housekeeping task); preventive maintenance (including BMPs to inspect and maintain stormwater drainage, source controls, treatment systems, and plant equipment and systems, and the schedule/frequency for each task); spill prevention and emergency cleanup plan (including BMPs to prevent spills that can contaminate stormwater, for material handling procedures, storage requirements, cleanup equipment and procedures, and spill logs); employee training (including an overview of what is in the SWPPP, how employees make a difference in complying with the SWPPP, spill response procedures, good housekeeping, maintenance requirements, and material management practices, how training will be conducted, the frequency/schedule of training, and a log of the dates on which specific employees received training); inspections and recordkeeping (including documentation of procedures to ensure compliance with permit requirements for inspections and recordkeeping, including identification of personnel who conduct inspections, provision of a tracking or follow-up procedure to ensure that a report is prepared and appropriate action taken in response to visual monitoring, definition of how Port of Olympia will comply with signature and record retention requirements, and certification of compliance with the SWPPP and Permits).

12. Port of Olympia's SWPPP does not comply with Condition S3.B.4.b.i.7 of the Permits because it does not include measures to identify and eliminate the discharge of process wastewater, domestic wastewater, noncontact cooling water, and other illicit discharges to stormwater sewers, or to surface waters and ground waters of the state.

13. Port of Olympia's SWPPP does not comply with Condition S3.B.4.b.ii of the Permits because it does not include required structural source control BMPs to minimize the exposure of manufacturing, processing, and material storage areas to rain, snow, snowmelt, and runoff. Port of Olympia's SWPPP does not comply with Condition S3.B.4.b.iii of the Permits because it does not include treatment BMPs as required.

14. Port of Olympia's SWPPP fails to comply with Condition S3.B.4.b.v of the Permits because it does not include BMPs to prevent the erosion of soils or other earthen materials and prevent off-site sedimentation and violations of water quality standards.

15. Port of Olympia's SWPPP fails to satisfy the requirements of Condition S3.B.5 Permits because it fails to include a stormwater sampling plan as required. The SWPPP does not include a sampling plan that identifies points of discharge to surface waters, storm sewers, or discrete ground water infiltration locations, documents why each discharge point is not sampled, identifies each sampling point by its unique identifying number, identifies staff responsible for conducting stormwater sampling, specifies procedures for sampling collection and handling, specifies procedures for sending samples to the a laboratory, identifies parameters for analysis, holding times and preservatives, laboratory quantization levels, and analytical methods, and that specifies the procedure for submitting the results to Ecology.

III. MONITORING AND REPORTING VIOLATIONS.

A. Failure to Collect Quarterly Samples.

Condition S4.B of the Permits requires Port of Olympia to collect a sample of its stormwater discharge once during every calendar quarter. Conditions S3.B.5.b and S4.B.2.c of the Permits require Port of Olympia to collect stormwater samples at each distinct point of discharge offsite except for substantially identical outfalls when documented in the SWPPP, in which case only one of the substantially identical outfalls must be sampled. These conditions set forth sample collection criteria, but require the collection of a sample even if the criteria cannot be met. The Port of Olympia Facility has at least two distinct points of discharge off-site: outfall A (Monitoring Point A02) and outfall C (Monitoring Point TF1). Additional unnamed distinct discharge points exist, including a number of slot drains and round ports on the dock side of the Facility which discharge directly into Budd Inlet.

Port of Olympia violated these requirements by failing to collect stormwater samples at any of its discharge points during the second quarter of 2016.

Port of Olympia has also violated and continues to violate these conditions because it does not sample each distinct point of discharge off-site. Namely, Port of Olympia does not

monitor discharge from the approximately 52 wharf drains, consisting of slot drains and round ports (also known as “scuppers”), on the dock side of the Terminal in Drainage Basin A, which discharge directly to Budd Inlet. These violations have occurred and continue to occur each and every quarter during the last five years that Port of Olympia was and is required to sample its stormwater discharges, including the quarters in which it collected stormwater discharge samples from some, but not each, point of discharge. These violations will continue until Defendant commences monitoring all distinct points of discharge.

B. Failure to Analyze Quarterly Samples.

Condition S5.A.1 of the Permits requires Port of Olympia to analyze stormwater samples collected quarterly for turbidity, pH, total copper, total zinc, TSS, and COD.

Port of Olympia violated these conditions by failing to analyze stormwater samples during the second quarter of 2016.

C. Failure to Timely Submit Discharge Monitoring Reports.

Condition S9.A of the Permits requires Port of Olympia to use DMR forms provided or approved by Ecology to summarize, report and submit monitoring data to Ecology. For each monitoring period (calendar quarter) a DMR must be completed and submitted to Ecology not later than 45 days after the end of the monitoring period. Port of Olympia has violated these conditions by failing to submit a DMR within the time prescribed for the first quarter of 2011, second quarter of 2011, third quarter of 2011, fourth quarter of 2011, first quarter of 2013, fourth quarter of 2013, first quarter of 2014, and second quarter of 2014.

D. Failure to Comply with Visual Monitoring Requirements.

Condition S7.A of the Permits requires that monthly visual inspection be conducted at the facility by qualified personnel. Each inspection is to include observations made at stormwater sampling locations and areas where stormwater associated with industrial activity is discharged, observations for the presence of floating materials, visible oil sheen, discoloration, turbidity, odor, etc. in the stormwater discharges, observations for the presence of illicit discharges, a verification that the descriptions of potential pollutant sources required by the permit are accurate, a verification that the site map in the SWPPP reflects current conditions, and an assessment of all BMPs that have been implemented (noting the effectiveness of the BMPs inspected, the locations of BMPs that need maintenance, the reason maintenance is needed and a schedule for maintenance, and locations where additional or different BMPs are needed).

Condition S7.C of the Permits requires that Port of Olympia record the results of each inspection in an inspection report or checklist that is maintained on-site and that documents the observations, verifications, and assessments required. The report/checklist must include the time and date of the inspection, the locations inspected, a statement that, in the judgment of the person conducting the inspection and the responsible corporate officer, the facility is either in compliance or out of compliance with the SWPPP and the Permits, a summary report

and schedule of implementation of the remedial actions that Port of Olympia plans to take if the site inspection indicates that the facility is out of compliance, the name, title, signature and certification of the person conducting the facility inspection, and a certification and signature of the responsible corporate officer or a duly authorized representative.

Port of Olympia is in violation of these requirements of Condition S7 of the Permits because, during the last five years, it has failed to conduct each of the requisite visual monitoring and inspections, failed to prepare and maintain the requisite inspection reports or checklists, and failed to make the requisite certifications and summaries.

E. Failure to Comply with Storm Drain Solids Sampling and Reporting Requirements

Condition S6.C.2.d of the 2015 Permit requires that permittees who discharge to Puget Sound Sediment Cleanup Sites remove accumulated solids from storm drain lines owned or controlled by the permittee at least once prior to October 1, 2016. Condition S6.C.2.e of the 2015 Permit requires permittees sample and analyze storm drain solids in accordance with Table 8 of the 2015 Permit at least once prior to October 1, 2016. Condition S6.C.2.f of the 2015 Permit requires that all storm drain solids sampling data shall be reported to Ecology on a Solids Monitoring Report (SMR) no later than the DMR due date for the reporting period in which the solids were sampled, in accordance with Condition S9.A of the 2015 Permit.

Port of Olympia is in violation of these Conditions by failing to remove accumulated solids from storm drain lines at least once prior to October 1, 2016, failing to sample and analyze its storm drain solids at least once prior to October 1, 2016, and failing to report results of storm drain solids sampling to Ecology on an SMR.

IV. CORRECTIVE ACTION VIOLATIONS.

A. Violations of the Level One Requirements of the Permits.

Condition S8.B of the Permits requires Port of Olympia take specified actions, called a "Level One Corrective Action," each time quarterly stormwater sample results exceed a benchmark value or are outside the benchmark range.

As described by Condition S8.B of the Permits, a Level One Corrective Action requires Port of Olympia to: (1) review the SWPPP for the facility and ensure that it fully complies with Condition S3 of the Permits and contains the correct BMPs from the applicable Stormwater Management Manual; (2) make appropriate revisions to the SWPPP to include additional operational source control BMPs with the goal of achieving the applicable benchmark values in future discharges and sign and certify the revised SWPPP in accordance with Condition S3.A.6 of the Permits; and (3) summarize the Level One Corrective Action in the Annual Report required under Condition S9.B of the Permits. Condition S8.B.3 of the Permits requires Port of Olympia to implement the revised SWPPP as soon as possible, and no later than the DMR due date for the quarter the benchmark was exceeded.

Condition S5.A and Table 2 of the Permits establish the following benchmarks: turbidity 25 NTU; pH 5 – 9 SU; total copper 14 µg/L; and total zinc 117 µg/L. Condition S5.B and Table 3 of the Permits establish the following additional benchmarks that are applicable to Port of Olympia: COD 120 mg/L; and TSS 100 mg/L. Condition S6.C.2.a and Table 7 of the Permits establish the following additional effluent limit that is applicable to Port of Olympia: TSS 30 mg/L.

Port of Olympia has violated the requirements of the Permits described above by failing to conduct a Level One Corrective Action in accordance with permit conditions, including the required review, revision and certification of the SWPPP, the required implementation of additional BMPs, and the required summarization in the annual report each and every time in the last five year its quarterly stormwater sampling results were greater than a benchmark or outside the benchmark ranges, including the benchmark exceedances listed in Table 1 above.

B. Violations of the Level Two Requirements of the Permits.

Condition S8.C of the Permits requires Port of Olympia take specified actions, called a “Level Two Corrective Action,” each time quarterly stormwater sample results exceed an applicable benchmark value or are outside the benchmark range for any two quarters during a calendar year.

As described by Condition S8.C of the Permits, a Level Two Corrective Action requires that Port of Olympia: (1) review the SWPPP for the facility and ensure that it fully complies with Condition S3 of the Permits; (2) make appropriate revisions to the SWPPP to include additional structural source control BMPs with the goal of achieving the applicable benchmark value(s) in future discharges and sign and certify the revised SWPPP in accordance with Condition S3.A.6 of the Permits; and (3) summarize the Level Two Corrective Action (planned or taken) in the Annual Report required under Condition S9.B of the Permits. Condition S8.C.4 of the Permits requires Port of Olympia to implement the revised SWPPP according to Condition S3 of the Permits and the applicable stormwater management manual as soon as possible, and no later than August 31st of the following year.

The Permits establish the benchmarks applicable to Port of Olympia are described in section IV.A of this notice of intent to sue letter.

Port of Olympia has violated the requirements of the Permits described above by failing to conduct a Level Two Corrective Action in accordance with permit conditions, including the required review, revision and certification of the SWPPP, the required implementation of additional BMPs, including additional structural source control BMPs, and the required summarization in the annual report each time since January 1, 2010, its quarterly stormwater sampling results were greater than a benchmark or outside the benchmark range for any two quarters during a calendar year. As indicated in Table 1 above, these violations include, but are not limited to, Port of Olympia’s failure to fulfill these obligations for zinc, COD, turbidity, and TSS triggered by its stormwater sampling during calendar year 2011; for zinc, COD, turbidity, TSS, and copper triggered by its stormwater sampling during calendar

year 2012; for zinc, COD, turbidity, TSS, and copper triggered by its stormwater sampling during calendar year 2013; for zinc, COD, turbidity, TSS, and copper triggered by its stormwater sampling during calendar year 2014; for COD triggered by its stormwater sampling during calendar year 2015; and for COD triggered by its stormwater sampling during calendar year 2016.

V. VIOLATIONS OF THE ANNUAL REPORT REQUIREMENTS.

Condition S9.B of the Permits requires Port of Olympia to submit an accurate and complete annual report to Ecology no later than May 15th of each year. The annual report must include corrective action documentation as required in Condition S8.B – D of the Permits. If a corrective action is not yet completed at the time of submission of the annual report, Port of Olympia must describe the status of any outstanding corrective action. Specific information to be included in the annual report is identification of the conditions triggering the need for corrective action, description of the problem and identification of dates discovered, summary of any Level One, Two, or Three corrective actions completed during the previous calendar year, including the dates corrective actions completed, and description of the status of any Level Two or Three corrective actions triggered during the previous calendar year, including identification of the date Port of Olympia expects to complete corrective actions.

Port of Olympia has violated this condition. The annual report submitted by Port of Olympia for 2012 (in February 2013) does not identify the conditions triggering the need for correction action or describe those problems or the dates they were discovered. The annual report submitted by Port of Olympia for 2013 (in March 2014) does not identify the conditions triggering the need for correction action or describe those problems or the dates they were discovered. The annual report submitted by Port of Olympia for 2014 (in March 2015) does not include the required information. Specifically, Port of Olympia does not provide an adequate description of the Level Three Corrective Action. Additionally, the 2014 annual report does not identify the conditions triggering the need for correction action or describe those problems or the dates they were discovered. The annual report submitted by Port of Olympia for 2015 (in January 2016) does not include the required information. Specifically, Port of Olympia does not provide a date upon which it expects to complete the Level 3 action, instead just stating, “2016.”

VI. EFFLUENT LIMIT VIOLATIONS.

Condition S6.C.1 of the 2015 Permit requires Permittees discharging to a “303(d)-listed” waterbody (Water Quality Category 5), either directly or indirectly through a stormwater drainage system must comply with the applicable sampling requirements and numeric effluent limits in Table 6 of the 2015 Permit. The “applicable sampling requirements and numeric effluent limits” means the sampling and effluent limits in Table 6 that correspond to the specific parameter(s) the receiving was is 303(d)-listed for at the time of permit coverage, or Total Suspended Solids (TSS) if the waterbody is 303(d)-listed for sediment quality at the time of permit coverage. *See also* 2015 Permit Condition S6.C.2.b (Inner Budd Inlet is also a Puget Sound Sediment Cleanup Site, subject to this condition).

Condition S6.C.1 of the 2010 Permit contained substantially identical requirements, but refers to Table 5 of that Permit.

Port of Olympia discharges to a segment of Budd Inlet, which is 303(d)-listed (Category 5) for sediment bioassay, and has been so listed for sediment bioassay since the 2012 water quality assessment. Port of Olympia's discharges are subject to a maximum daily effluent limitation of 30 mg/L for TSS. Port of Olympia discharges stormwater that contains elevated levels of TSS in excess of the corresponding numeric effluent limitation, as indicated in the table of effluent limitation violations below. Each and every one of these discharges is a separate violation of the Permits and occurred on dates within the identified calendar quarters known to the Port of Olympia.

Table 2 – Numeric Effluent Limitation Violations

Calendar quarter including date of violation	Daily Maximum TSS concentration in: mg/L (monitoring point)
1st Quarter 2012	287 (I01), 50.7 (I01), 495 (SW1)
2nd Quarter 2012	37.3 (I01), 78 (MH1), 196.7 (SW1)
3rd Quarter 2012	45 (I01), 33 (MH1), 190 (SW1)
4th Quarter 2012	62 (A02), 165 (I01), 62 (MH1), 96.5 (SB1), 820 (SW1)
1st Quarter 2013	202.7 (I01), 190 (SB1), 190 (SW1)
2nd Quarter 2013	31.1 (A02), 87.3 (I01), 54.5 (MH1), 94 (SB1), 258 (SW1)
3rd Quarter 2013	671 (I01), 71.5 (MH1), 67 (SB1), 300 (SW1)
4th Quarter 2013	518 (I01), 117.5 (MH1), 48 (SB1), 290 (SW1)
1st Quarter 2014	36 (MH1), 98 (SB1), 276.6 (SW1)
2nd Quarter 2014	90 (SB1), 31 (SW1)
3rd Quarter 2014	501.5 (SW1)
1st Quarter 2015	36.33 (TF1)
3rd Quarter 2015	33 (A02)
1st Quarter 2016	64 (TF1)

VII. ILLICIT AND PROHIBITED DISCHARGES.

Condition S5.E of the Permits prohibits the discharge of process wastewater (including stormwater that comingles with process wastewater) and illicit discharges. Appendix 2 to the Permits defines "illicit discharges" as "any discharge that is not composed entirely of stormwater." Condition S5.F of the Permits requires Port of Olympia to manage stormwater to prevent the discharge of synthetic, natural or processed oil or oil containing products as identified by an oil sheen, and trash and floating debris, prohibiting those discharges.

Port of Olympia's discharges of grain dust and process wastewater from dust control operations violate these Permit conditions. Port of Olympia generates discharges of grain dust during loading and offloading of grain from ships. Grain dust is also generated at all

grain transfer points, including transfers from inside the warehouse building and from the conveyor belt. Furthermore, grain dust is generated when loaders are cleaned using air hoses. Process wastewater discharges are created when a water truck is used for dust control operations. These prohibited discharges occurred each and every day over the past five years on which Port of Olympia loaded or offloaded grain from ships, transferred grain around the facility, cleaned grain loaders using air hoses, and used water trucks for dust control (which dates are known to the Port of Olympia) and are reasonably likely to continue to occur.

Condition S7.B.3.b of the Permits also requires Port of Olympia to eliminate illicit discharges within 30 days of discovery; and Condition S3.B.4.b.i.7 of the Permits require Port of Olympia's SWPPP to include measures to identify and eliminate illicit discharges to surface waters. Port of Olympia violated these requirements by failing to eliminate its illicit discharges altogether over the last five years and failing to include measure to identify and eliminate illicit discharges in its SWPPP.

Additionally, Condition S7.B.3.a of the Permits requires Port of Olympia to notify the Department of Ecology within seven days of any discovery of an illicit discharge. Port of Olympia violated this requirement by failing to notify Ecology about its illicit discharges within seven days of each occurrence over the past five years.

VIII. MODIFICATION OF PERMIT COVERAGE VIOLATIONS.

Condition S2.B of the Permits requires Port of Olympia to submit a complete Modification of Coverage Form to Ecology when Port of Olympia anticipates a significant process change. This application for modification must be submitted at least 60 days prior to implementing a significant process change. Port of Olympia must complete the public notice requirements in WAC 173-226-130(5) as part a complete application for modification of coverage. And Port of Olympia must comply with the State Environmental Protection Act (SEPA) as part of a complete application for modification of coverage if undergoing a significant process change. Furthermore, general condition G19 requires Port of Olympia to, as soon as possible, give notice to Ecology of planned physical alterations, modification or additions to the permitted industrial activity, which will result in a significant process change. A "significant process change" is defined in the Permits at Appendix 2 as "any modification of the facility that would result in any of the following: (1) Add different pollutants in a significant amount to the discharge, (2) Increase the pollutants in the stormwater discharge by a significant amount, (3) Add a new industrial activity (SIC) that was not previously covered, (4) Add additional impervious surface or acreage such that stormwater discharge would be increased by 25% or more."

Port of Olympia violated condition S2.B and G19 of the Permits by failing to apply for a Modification of Coverage for two significant process changes, including a failure to comply with the public notice requirements and SEPA compliance requirements. These first significant process change at this facility was the initiation of importation and warehousing of corn sometime after the facility obtained Permit coverage and before May 16, 2016. Port of Olympia was required to apply for a Modification of Permit coverage for this process change because the importation or exportation of a new product, in this case, corn, could add different

pollutants in a significant amount to the discharge or increase the pollutants in the discharge by a significant amount. The second significant process change was the initiation of exportation of cattle sometime after the facility obtained Permit coverage and before May 16, 2016. Port of Olympia was required to apply for a Modification of Permit coverage for this process change because the exportation of cattle could add different pollutants in a significant amount to the discharge or increase the pollutants in the discharge by a significant amount. Furthermore, the storage of farm product, which Port of Olympia is engaging in for both corn storage and cattle storage while these products await loading or offloading, is an new industrial activity with a different SIC code that was not previously covered. The SIC code for storage of farm product is 4221. Currently, the only SIC codes associated with the facility are for logging and marine cargo handling, SIC codes 2411 and 4491.

IX. VIOLATIONS OF THE RECORDKEEPING REQUIREMENTS.

A. Failure to Record Information.

Condition S4.B.3 of the Permits requires Port of Olympia to record and retain specified information for each stormwater sample taken, including the sample date and time, a notation describing if Port of Olympia collected the sample within the first 30 minutes of stormwater discharge event, an explanation of why Port of Olympia could not collect a sample within the first 30 minutes of a stormwater discharge event, the sample location, method of sampling and of preservation, and the individual performing the sampling. Upon information and belief, Port of Olympia is in violation of these conditions as it has not recorded each of these specified items for each sample taken during the last five years.

B. Failure to Retain Records.

Condition S9.C of the Permits requires Port of Olympia to retain for a minimum of five years a copy of the Permits, a copy of Port of Olympia's coverage letter, records of all sampling information, inspection reports including required documentation, any other documentation of compliance with permit requirements, all equipment calibration records, all BMP maintenance records, all original recordings for continuous sampling instrumentation, copies of all laboratory results, copies of all required reports, and records of all data used to complete the application for the Permits. Upon information and belief, Port of Olympia is in violation of these conditions because it has failed to retain records of such information, reports, and other documentation during the last five years.

X. FAILURE TO REPORT PERMIT VIOLATIONS.

Condition S9.E of the Permits requires Port of Olympia to take certain actions in the event it is unable to comply with any of the terms and conditions of the Permits which may endanger human health or the environment, or exceed any numeric effluent limitation in the permit. In such circumstances, Port of Olympia must immediately take action to minimize potential pollution or otherwise stop the noncompliance and correct the problem, and Port of Olympia must immediately notify the appropriate Ecology regional office of the failure to comply. Port of Olympia must then submit a detailed written report to Ecology, including

specified details, within 5 days of the time Port of Olympia became aware of the circumstances unless Ecology requests an earlier submission.

On information and belief, Defendant routinely violates these requirements, including each and every time Port of Olympia exceeded the numeric effluent limitation for TSS, as specified in Table 2, above, each and every time Port of Olympia discharges illicit and/or non-stormwater discharges, as described in section VII to this notice of intent to sue, above, each and every time Port of Olympia failed to comply with the corrective action requirements described in section IV of this Notice of Intent to Sue, and each and every time Port of Olympia discharged stormwater with concentrations of pollutants in excess of the Permit benchmarks, as described in Table 1, above. All these violations may endanger human health or the environment.

XI. VIOLATIONS OF THE RIGHT OF INSPECTION AND ENTRY

General Condition G3 of the Permits requires Port of Olympia to allow an authorized representative of Ecology, upon the presentation of credentials and other such documents: (1) to enter the premises where a discharge is located or where any records shall be kept; (2) to have access to and copy, at reasonable times and at reasonable cost, any records required to be kept under the terms and conditions of the Permit; (3) to inspect, at reasonable times, any facilities, equipment (including sampling and control equipment), practices, methods, or operations regulated or required under the Permit; and (4) to sample or monitor, at reasonable times, any substances or parameters at any location for purposes of assuring permit compliance or as otherwise directed by the CWA.

Port of Olympia has violated this condition by denying the right of entry and inspection to Ecology inspectors on the following occasions: January 28, 2015, January 29, 2015, and March 31, 2016. On information and belief, other such denials of access have occurred during the last five years.

XII. UNPERMITTED DISCHARGES

The Permits authorize only the discharges of stormwater and pollutants contained in stormwater. Defendant does not possess and has never possessed an NPDES permit for its non-stormwater direct discharges of grain dust and process wastewater to Budd Inlet. The point sources of illicit discharges of pollutants at Port of Olympia's facility include the clamshell used to load and offload grain from ships, the conveyor belt used to load and offload grain from ships and transfer grain around the facility, grain storage areas, and the facility itself. These point source discharges violate the Clean Water Act's § 301(a), 33 U.S.C. § 1311(a), prohibition on pollutant discharges because they are authorized by no NPDES permit. These violations occurred on March 31, 2016, as well as each and every day over the past five years on which Port of Olympia loaded or offloaded grain from ships, loaded or offloaded grain from trains, transferred grain around the facility, cleaned grain loaders using air hoses, and used water trucks for dust control, which days are known to or discernible by the Port, and are reasonably likely to continue to occur whenever these activities occur going forward.

XIII. REQUEST FOR SWPPP.

Pursuant to Condition S9.F of the Permits, Waste Action Project hereby requests that Port of Olympia provide a copy of, or access to, its SWPPP complete with all incorporated plans, monitoring reports, checklists, and training and inspection logs. The copy of the SWPPP and any other communications about this request should be directed to the undersigned at the letterhead address.

Should Port of Olympia fail to provide the requested complete copy of, or access to, its SWPPP as required by Condition S9.F of the Permits, it will be in violation of that condition, which violation shall also be subject to this Notice of Intent to Sue and any ensuing lawsuit.

XIV. CONCLUSION.

The above-described violations reflect those indicated by the information currently available to Waste Action Project. These violations are ongoing. Waste Action Project intends to sue for all violations, including those yet to be uncovered and those committed after the date of this Notice of Intent to Sue.

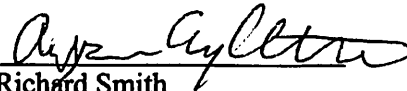
Pursuant to Sections 309(d) and 505(a) of the CWA, 33 U.S.C. §§ 1319(d) and 1365(a), and 40 C.F.R. § 19 and 19.4, each of the above-described violations subjects the violator to a penalty of up to \$37,500 per day for each violation for violations committed through November 2, 2015 and up to \$51,570 per day for each violation committed thereafter. In addition to civil penalties, Waste Action Project will seek injunctive relief to prevent further violations under Sections 505(a) and (d) of the CWA, 33 USC § 1365(a) and (d), and such other relief as is permitted by law. Also, Section 505(d) of the CWA, 33 USC § 1365(d), permits prevailing parties to recover costs, including attorney's fees.

Waste Action Project believes that this NOTICE OF INTENT TO SUE sufficiently states grounds for filing suit. We intend, at the close of the 60-day notice period, or shortly thereafter, to file a citizen suit against Port of Olympia under Section 505(a) of the Clean Water Act for violations.

During the 60-day notice period, we would be willing to discuss effective remedies for the violations addressed in this letter and settlement terms. If you wish to pursue such discussions in the absence of litigation, we suggest that you initiate those discussions within 10 days of receiving this notice so that a meeting can be arranged and so that negotiations may be completed promptly. We do not intend to delay the filing of a complaint if discussions are continuing when the notice period ends.

Very truly yours,

SMITH & LOWNEY, PLLC

By: 
Richard Smith
Alyssa Englebrecht

cc: Scott Pruitt, Administrator, U.S. EPA
Michelle Pirzadeh, Administrator, Region 10 U.S. EPA
Maia Bellon, Director, Washington Department of Ecology

Precipitation Data

2012	Precip. Accum	29	0.08 in	27	0 in
		30	0.28 in	28	0.02 in
Apr	Sum	2012	Precip. Accum.	29	0 in
4	0.22 in			30	0 in
5	0.05 in	May	Sum	31	0.28 in
6	0.03 in	1	0.13 in	2012	Precip. Accum.
7	0 in	2	0 in	Jun	Sum
8	0 in	3	0.79 in	1	0.11 in
9	0 in	4	0.01 in	2	0.03 in
10	0.02 in	5	0 in	3	0 in
11	0.48 in	6	0 in	4	0.03 in
12	0.03 in	7	0 in	5	0.1 in
13	0.01 in	8	0 in	6	0 in
14	0 in	9	0 in	7	0.55 in
15	0.04 in	10	0 in	8	0.15 in
16	0.4 in	14	0 in	9	0 in
17	0.2 in	15	0 in	10	0 in
18	0.1 in	16	0 in	11	0 in
19	0.69 in	17	0 in	12	0.01 in
20	0.15 in	18	0 in	13	0.01 in
21	0 in	19	0 in	14	0 in
22	0 in	20	0.16 in	15	0 in
23	0 in	21	0.25 in	16	0 in
24	0.07 in	22	0.39 in	17	0.03 in
25	0.67 in	23	0.34 in	18	0.03 in
26	0.23 in	24	0.12 in	19	0 in
27	0.06 in	25	0 in	20	0 in
28	0 in	26	0 in		

Precipitation Data

21	0 in	18	0 in	12	0 in
22	0.12 in	19	0 in	13	0 in
23	0.28 in	20	0.27 in	14	0 in
24	0 in	21	0 in	15	0 in
25	0 in	22	0 in	16	0 in
26	0 in	23	0 in	17	0 in
27	0 in	24	0 in	18	0 in
28	0.01 in	25	0 in	19	0 in
29	0.01 in	26	0 in	20	0 in
30	0.25 in	27	0 in	21	0 in
<hr/>		28	0 in	22	0 in
2012	Precip. Accum.	29	0 in	23	0 in
<hr/>		30	0 in	24	0 in
Jul	Sum	31	0 in	25	0 in
1	0 in	<hr/>		26	0.04 in
2	0.09 in	2012	Precip. Accum.	27	0 in
3	0.19 in	<hr/>		28	0 in
4	0 in	Aug	Sum	29	0 in
5	0 in	1	0 in	30	0 in
6	0 in	2	0 in	31	0 in
7	0 in	3	0 in	<hr/>	
8	0 in	4	0 in	2012	Precip. Accum.
9	0 in	5	0 in	<hr/>	
10	0 in	6	0 in	Sep	Sum
11	0 in	7	0 in	1	0 in
12	0 in	8	0 in	2	0 in
13	0.15 in	9	0 in	3	0 in
16	0 in	10	0 in	4	0 in
17	0 in	11	0 in	5	0 in

Precipitation Data

6	0 in	2	0 in	2012	Precip. Accum.
7	0 in	3	0 in		
8	0 in	4	0 in	Nov	Sum
9	0 in	5	0 in		
10	0 in	6	0 in	1	0.42 in
11	0 in	7	0 in	2	0.2 in
12	0 in	8	0 in	3	0.05 in
13	0 in	9	0 in	4	0.12 in
14	0 in	10	0 in	5	0.01 in
15	0 in	12	0.14 in	6	0.01 in
16	0 in	13	0.31 in	7	0.01 in
17	0 in	14	0.52 in	8	0 in
18	0 in	15	0.33 in	9	0.01 in
19	0 in	16	0.16 in	10	0.01 in
20	0 in	17	0 in	11	0.83 in
21	0 in	18	0.42 in	12	0.27 in
22	0 in	19	0.14 in	13	0.12 in
24	0 in	20	0.2 in	14	0.02 in
25	0 in	21	0.24 in	15	0 in
26	0 in	22	0.3 in	16	0.2 in
27	0 in	23	0.01 in	17	0.31 in
28	0 in	24	0.18 in	18	0.62 in
29	0 in	25	0.02 in	19	2.16 in
30	0 in	26	0.11 in	20	0.33 in
2012	Precip. Accum.	27	0.56 in	21	0.61 in
		28	0.3 in	22	0.05 in
Oct	Sum	29	0.45 in	23	0.56 in
		30	1.63 in	24	0 in
1	0 in	31	1.06 in	25	0 in

Precipitation Data

26	0.01 in	21	0.04 in	16	0.01 in
27	0.01 in	22	0.18 in	17	0 in
28	0.05 in	23	0.26 in	18	0 in
29	0.17 in	24	0.05 in	19	0 in
30	1.15 in	25	0.61 in	20	0 in
<hr/>		26	0.11 in	21	0 in
2012	Precip. Accum.	27	0 in	22	0.01 in
<hr/>		28	0.01 in	23	0.18 in
Dec	Sum	29	0.05 in	24	0.2 in
1	0.56 in	30	0 in	25	0.01 in
2	0.72 in	31	0.07 in	26	0.1 in
3	0.56 in	<hr/>		27	0.03 in
4	0.63 in	2013	Precip. Accum.	28	0.02 in
5	0.13 in	<hr/>		29	0.01 in
6	0.27 in	Jan	Sum	30	0.2 in
7	0.2 in	1	0.01 in	31	0.03 in
8	0.01 in	2	0.01 in	<hr/>	
9	0.12 in	4	0.03 in	2013	Precip. Accum.
10	0.03 in	5	0.06 in	<hr/>	
11	0.23 in	6	0.19 in	Feb	Sum
12	0 in	7	0.33 in	1	0.01 in
13	0 in	8	0.97 in	2	0 in
14	0.04 in	9	0.68 in	3	0 in
15	0.36 in	10	0 in	4	0 in
16	0.97 in	11	0 in	5	0.43 in
17	0.51 in	12	0.01 in	6	0.18 in
18	0.41 in	13	0 in	7	0.01 in
19	1.16 in	14	0.02 in	8	0.01 in
20	0.55 in	15	0 in	9	0 in

Weather History for Swantown Marina

Downloaded from <https://www.wunderground.com/personal-weather-station/dashboard?ID=KWAOLYMP8#history/>

Precipitation Data

10	0 in	7	0.27 in	1	0 in
11	0.03 in	8	0 in	2	0 in
12	0.02 in	9	0 in	3	0 in
13	0.02 in	10	0.04 in	4	0.39 in
14	0.01 in	11	0.15 in	5	0.85 in
15	0 in	12	0.2 in	6	0.45 in
16	0.02 in	13	0.21 in	7	0.67 in
17	0 in	14	0 in	8	0 in
18	0.02 in	15	0.04 in	9	0 in
19	0.02 in	16	0.18 in	10	0.36 in
20	0.1 in	17	0.02 in	11	0 in
21	0.18 in	18	0.06 in	12	0.18 in
22	1.6 in	19	0.43 in	13	0.23 in
23	0.03 in	20	0.79 in	14	0.24 in
24	0.02 in	21	0.15 in	15	0.03 in
25	0.43 in	22	0 in	16	0.01 in
26	0.02 in	23	0 in	17	0 in
27	0.13 in	24	0 in	18	0.02 in
28	0.68 in	25	0 in	19	0.24 in
<hr/>		26	0.01 in	20	0 in
2013	Precip. Accum.	27	0.01 in	21	0.08 in
<hr/>		28	0.22 in	22	0.01 in
Mar	Sum	29	0 in	23	0 in
1	0.04 in	30	0 in	24	0 in
2	0.04 in	31	0 in	25	0 in
3	0 in	<hr/>		26	0 in
4	0 in	2013	Precip. Accum.	27	0 in
5	0.16 in	<hr/>		28	0.17 in
6	0.31 in	Apr	Sum	29	0.02 in
<hr/>		<hr/>			

Precipitation Data

30	0 in	25	0.02 in	19	0 in
2013	Precip. Accum.	26	0.08 in	20	0 in
May	Sum	27	0.26 in	21	0 in
1	0 in	28	0.08 in	22	0 in
2	0 in	29	0.37 in	23	0.52 in
3	0 in	30	0.11 in	24	0.12 in
4	0 in	31	0 in	25	0.49 in
5	0 in	2013	Precip. Accum.	26	0.38 in
6	0 in	Jun	Sum	27	0.19 in
7	0 in	1	0 in	28	0 in
8	0 in	2	0 in	29	0.01 in
9	0 in	3	0 in	30	0 in
10	0 in	4	0 in	2013	Precip. Accum.
11	0 in	5	0 in	Jul	Sum
12	0.08 in	6	0 in	1	0 in
13	0.08 in	7	0 in	2	0 in
14	0 in	8	0 in	3	0 in
15	0.02 in	9	0 in	4	0 in
16	0.03 in	10	0 in	5	0 in
17	0.06 in	11	0.04 in	6	0 in
18	0.02 in	12	0.11 in	7	0 in
19	0 in	13	0.03 in	8	0 in
20	0.04 in	14	0 in	9	0 in
21	0.5 in	15	0 in	10	0 in
22	0.21 in	16	0 in	11	0 in
23	0.35 in	17	0.09 in	12	0 in
24	0.15 in	18	0.01 in	13	0 in

Precipitation Data

14	0 in	8	0 in	2	0.01 in
15	0 in	9	0 in	3	0.42 in
16	0 in	10	0.07 in	4	0 in
17	0 in	11	0 in	5	0 in
18	0 in	12	0 in	6	0.38 in
19	0 in	13	0 in	7	0 in
20	0 in	14	0.07 in	8	0.01 in
21	0 in	15	0.08 in	9	0 in
22	0 in	16	0 in	10	0 in
23	0 in	17	0 in	11	0 in
24	0 in	18	0 in	12	0 in
25	0 in	19	0 in	13	0 in
26	0 in	20	0 in	14	0 in
27	0 in	21	0 in	15	0.09 in
28	0 in	22	0 in	16	0.02 in
29	0 in	23	0 in	17	0.46 in
30	0 in	24	0.02 in	18	0.01 in
31	0 in	25	0 in	19	0 in
<hr/>		26	0.05 in	20	0.14 in
2013	Precip. Accum.	27	0.03 in	21	0 in
<hr/>		28	0.11 in	22	1.13 in
Aug	Sum	29	0.66 in	23	0.5 in
1	0 in	30	0 in	24	0.57 in
2	0.01 in	31	0 in	25	0.04 in
3	0 in	<hr/>		26	0 in
4	0.01 in	2013	Precip. Accum.	27	0.17 in
5	0 in	<hr/>		28	2.37 in
6	0 in	Sep	Sum	29	0.87 in
7	0 in	1	0 in	30	1.13 in

Precipitation Data

2013	Precip. Accum.	26	0 in	24	0.01 in
		27	0 in	25	0.01 in
Oct	Sum	28	0 in	26	0.01 in
1	0.49 in	29	0 in	27	0 in
2	0.41 in	30	0 in	28	0 in
3	0 in	31	0.08 in	29	0.01 in
4	0.01 in	2013	Precip. Accum.	30	0.1 in
5	0.01 in			2013	Precip. Accum.
6	0.02 in	Nov	Sum	Dec	Sum
7	0.24 in	1	0.02 in	1	0.61 in
8	0.08 in	2	0.44 in	2	0.02 in
9	0.01 in	4	0.05 in	3	0 in
10	0.05 in	5	0.17 in	4	0 in
11	0 in	6	0.27 in	5	0 in
12	0.11 in	7	1.04 in	6	0 in
13	0 in	8	0 in	7	0 in
14	0.01 in	12	0.14 in	8	0 in
15	0.01 in	13	0.05 in	9	0 in
16	0 in	14	0 in	10	0.01 in
17	0 in	15	0.28 in	11	0 in
18	0.01 in	16	0 in	12	0.23 in
19	0.01 in	17	0.31 in	13	0 in
20	0 in	18	0.99 in	14	0 in
21	0 in	19	0.08 in	15	0.05 in
22	0 in	20	0.01 in	16	0.01 in
23	0.01 in	21	0 in	17	0 in
24	0.01 in	22	0.01 in	18	0.01 in
25	0 in	23	0 in		

Weather History for Swantown Marina

Downloaded from <https://www.wunderground.com/personal-weather-station/dashboard?ID=KWAOLYMP8#history/>

Precipitation Data

19	0 in	13	0.07 in	7	0 in
20	0.17 in	14	0 in	8	0 in
21	0.06 in	15	0 in	9	0.28 in
22	0.02 in	16	0 in	10	0.43 in
23	0.22 in	17	0 in	11	0.87 in
24	0 in	18	0 in	12	0.53 in
25	0 in	19	0.01 in	13	0.09 in
26	0 in	20	0 in	14	0.54 in
27	0.01 in	21	0 in	15	0.66 in
28	0 in	22	0.02 in	16	0.93 in
29	0 in	23	0 in	17	0.86 in
30	0 in	24	0 in	18	0.91 in
31	0.06 in	25	0.01 in	19	0.37 in
<hr/>		26	0.01 in	20	0.33 in
2014	Precip. Accum.	27	0.01 in	21	0.02 in
<hr/>		28	0.48 in	22	0 in
Jan	Sum	29	0.35 in	23	0.2 in
1	0.01 in	30	0.13 in	24	0.76 in
2	0.14 in	31	0.05 in	25	0 in
3	0 in	<hr/>		26	0 in
4	0.01 in	2014	Precip. Accum.	27	0 in
5	0.01 in	<hr/>		28	0 in
6	0.2 in	Feb	Sum	<hr/>	
7	0.23 in	1	0.05 in	2014	Precip. Accum.
8	0.49 in	2	0 in	<hr/>	
9	0.37 in	3	0 in	Mar	Sum
10	0.53 in	4	0 in	1	0 in
11	1.54 in	5	0 in	2	0.6 in
12	0.23 in	6	0 in	3	0.43 in

Precipitation Data

4	0.33 in	1	0 in	30	0 in
5	1.13 in	2	0 in	2014	Precip. Accum.
6	0.64 in	3	0.23 in		
7	0 in	4	0.09 in	May	Sum
8	1.64 in	5	0.25 in	1	0 in
9	0.33 in	6	0 in	2	0 in
10	0.06 in	7	0 in	3	0.83 in
11	0 in	8	0.2 in	4	0.43 in
12	0.01 in	9	0 in	5	0.22 in
13	0.02 in	10	0 in	6	0 in
14	0.43 in	11	0 in	7	0 in
15	0.01 in	12	0 in	8	0.45 in
19	0.12 in	13	0 in	9	0.22 in
20	0 in	14	0 in	10	0 in
21	0 in	15	0.01 in	11	0 in
22	0 in	16	0.09 in	12	0 in
23	0 in	17	0.53 in	13	0 in
24	0 in	18	0 in	14	0 in
25	0.15 in	19	0.58 in	15	0 in
26	0.25 in	20	0 in	16	0 in
27	0.25 in	21	0.11 in	17	0.06 in
28	0.78 in	22	0.22 in	18	0.1 in
29	0.66 in	23	0.62 in	19	0 in
30	0.07 in	24	0.44 in	20	0 in
31	0.01 in	25	0.15 in	21	0 in
2014	Precip. Accum.	26	0.35 in	22	0 in
		27	0.42 in	23	0.2 in
Apr	Sum	28	0.08 in	24	0 in
		29	0 in		

Precipitation Data

25	0.29 in	19	0 in	14	0 in
26	0 in	20	0 in	15	0 in
27	0.03 in	21	0 in	16	0 in
28	0 in	22	0 in	17	0 in
29	0 in	23	0.04 in	18	0 in
30	0 in	24	0 in	19	0 in
31	0 in	25	0 in	20	0 in
<hr/>		26	0.01 in	21	0 in
2014	Precip. Accum.	27	0.33 in	22	0 in
<hr/>		28	0.11 in	23	0.24 in
Jun	Sum	29	0 in	24	0 in
1	0 in	30	0 in	25	0 in
2	0 in	<hr/>		26	0 in
3	0 in	2014	Precip. Accum.	27	0 in
4	0 in	<hr/>		28	0 in
5	0 in	Jul	Sum	29	0 in
6	0 in	1	0 in	30	0 in
7	0 in	2	0 in	31	0 in
8	0 in	3	0 in	<hr/>	
9	0 in	4	0 in	2014	Precip. Accum.
10	0 in	5	0 in	<hr/>	
11	0 in	6	0 in	Aug	Sum
12	0.31 in	7	0 in	1	0 in
13	0.07 in	8	0 in	2	0 in
14	0 in	9	0 in	3	0 in
15	0.02 in	10	0 in	4	0 in
16	0.03 in	11	0 in	5	0 in
17	0 in	12	0 in	6	0 in
18	0 in	13	0 in	7	0 in

Weather History for Swantown Marina

Downloaded from <https://www.wunderground.com/personal-weather-station/dashboard?ID=KWAOLYMP8#history/>

Precipitation Data

27	0.11 in	21	0.89 in	16	0.03 in
28	0.1 in	22	0.36 in	17	0.07 in
29	0.05 in	23	0.43 in	18	0.45 in
30	0.08 in	24	0.23 in	19	0.07 in
31	0.08 in	25	0.62 in	20	1.71 in
<hr/>		26	0.1 in	21	0.36 in
2014	Precip. Accum.	27	0.23 in	22	0 in
<hr/>		28	0.2 in	23	0.38 in
Nov	Sum	29	0.07 in	24	0.2 in
1	0.07 in	30	0.05 in	25	0 in
2	0.06 in	<hr/>		26	0 in
3	0.07 in	2014	Precip. Accum.	27	0.28 in
4	0.04 in	<hr/>		28	0.06 in
5	0.05 in	Dec	Sum	29	0.24 in
6	0.06 in	1	0.14 in	30	0 in
7	0.04 in	2	0.25 in	31	0 in
8	0.04 in	3	0 in	<hr/>	
9	0.04 in	4	0.01 in	2015	Precip. Accum.
10	0.03 in	5	0.13 in	<hr/>	
11	0.02 in	6	0.18 in	Jan	Sum
12	0.04 in	7	0.01 in	1	0 in
13	0.01 in	8	0.23 in	2	0.03 in
14	0.36 in	9	0.58 in	3	0 in
15	0.8 in	10	0.53 in	4	1.94 in
16	0.22 in	11	0.29 in	5	0.91 in
17	0.05 in	12	0.24 in	6	0 in
18	0 in	13	0 in	7	0.01 in
19	0.01 in	14	0.01 in	8	0 in
20	0.03 in	15	0.01 in	9	0 in

Precipitation Data

10	0.09 in	4	0.3 in	1	0 in
11	0.09 in	5	0.74 in	2	0 in
12	0 in	6	0.77 in	3	0.01 in
13	0 in	7	1.15 in	4	0 in
14	0 in	8	0.28 in	5	0 in
15	0.49 in	9	0.16 in	6	0 in
16	0.03 in	10	0.02 in	7	0 in
17	1.11 in	11	0.01 in	8	0 in
18	0.14 in	12	0.04 in	9	0 in
19	0.05 in	13	0 in	10	0.01 in
20	0 in	14	0 in	11	0.19 in
21	0.02 in	15	0.01 in	12	0.02 in
22	0.05 in	16	0.01 in	13	0 in
23	0.3 in	17	0 in	14	1.15 in
24	0.04 in	18	0 in	15	2.08 in
25	0 in	19	0.03 in	16	0.01 in
26	0.01 in	20	0 in	17	0.03 in
27	0.01 in	21	0.01 in	18	0.01 in
28	0 in	22	0.01 in	19	0 in
29	0.01 in	23	0 in	20	0.22 in
30	0 in	24	0 in	21	0.28 in
31	0.01 in	25	0.07 in	22	0.08 in
<hr/>		26	0.14 in	23	0.56 in
2015	Precip. Accum.	27	0.62 in	24	0.15 in
<hr/>		28	0 in	25	0.35 in
Feb	Sum	<hr/>		26	0 in
1	0.1 in	2015	Precip. Accum.	27	0.06 in
2	0.3 in	<hr/>		28	0.05 in
3	0.01 in	Mar	Sum	29	0 in
<hr/>		<hr/>			

Precipitation Data

30	0.04 in	24	0.3 in	19	0 in
31	0.2 in	25	0.04 in	20	0 in
<hr/>		26	0.01 in	21	0 in
2015	Precip. Accum.	27	0.01 in	22	0.05 in
<hr/>		28	0 in	23	0 in
Apr	Sum	29	0.13 in	24	0 in
1	0.03 in	30	0 in	25	0 in
2	0 in	<hr/>		26	0 in
3	0.18 in	2015	Precip. Accum.	27	0 in
4	0 in	<hr/>		28	0 in
5	0 in	May	Sum	29	0 in
6	0 in	1	0 in	30	0 in
7	0.08 in	2	0 in	31	0 in
8	0 in	3	0 in	<hr/>	
9	0 in	4	0 in	2015	Precip. Accum.
10	0.57 in	5	0.15 in	<hr/>	
11	0.08 in	6	0 in	Jun	Sum
12	0.01 in	7	0 in	1	0.14 in
13	0.13 in	8	0 in	2	0 in
14	0.06 in	9	0 in	3	0 in
15	0 in	10	0 in	4	0 in
16	0 in	11	0.01 in	5	0 in
17	0 in	12	0.21 in	6	0 in
18	0 in	13	0.14 in	7	0 in
19	0 in	14	0.01 in	8	0 in
20	0 in	15	0 in	9	0 in
21	0 in	16	0 in	10	0 in
22	0 in	17	0 in	11	0 in
23	0.12 in	18	0 in	12	0 in

Precipitation Data

13	0 in	8	0 in	2	0 in
14	0 in	9	0 in	3	0 in
15	0 in	10	0 in	4	0 in
16	0 in	11	0.07 in	5	0 in
17	0 in	12	0 in	6	0 in
18	0 in	13	0 in	7	0 in
19	0 in	14	0 in	8	0 in
20	0 in	15	0 in	9	0 in
21	0 in	16	0 in	10	0 in
22	0 in	17	0 in	11	0 in
23	0 in	18	0 in	12	0 in
24	0 in	19	0 in	13	0 in
25	0 in	20	0 in	14	0.11 in
26	0 in	21	0 in	15	0.07 in
27	0 in	22	0 in	16	0.05 in
28	0.11 in	23	0 in	17	0.03 in
29	0 in	24	0 in	18	0.03 in
30	0 in	25	0 in	19	0.01 in
<hr/>		26	0 in	20	0.01 in
2015	Precip. Accum.	27	0 in	21	0.01 in
<hr/>		28	0 in	22	0 in
Jul	Sum	29	0 in	23	0 in
1	0 in	30	0 in	24	0 in
2	0 in	31	0 in	25	0 in
3	0 in	<hr/>		26	0 in
4	0 in	2015	Precip. Accum.	27	0 in
5	0 in	<hr/>		28	0.09 in
6	0 in	Aug	Sum	29	0.01 in
7	0 in	1	0 in	30	0.04 in

Precipitation Data

31	0.02 in	29	0 in	21	0.01 in
2015	Precip. Accum.	30	0 in	22	0 in
Sep	Sum	2015	Precip. Accum.	23	0.11 in
1	0.02 in	Oct	Sum	24	0.18 in
2	0.02 in	1	0 in	25	0 in
3	0.02 in	2	0.03 in	26	0 in
4	0.01 in	3	0 in	27	0.01 in
5	0.01 in	4	0 in	28	0.01 in
6	0.02 in	5	0 in	29	0.01 in
7	0.01 in	6	0 in	30	0.01 in
8	0.01 in	3	0 in	2015	Precip. Accum.
9	0.02 in	4	0.04 in	Dec	Sum
10	0 in	5	0.06 in	1	0.71 in
11	0.01 in	6	0 in	2	0.06 in
12	0.01 in	7	0.38 in	3	0.42 in
13	0 in	8	0.18 in	4	0.24 in
14	0.01 in	9	0.01 in	5	0.32 in
15	0 in	10	0.07 in	6	0.43 in
16	0.01 in	11	0.16 in	7	0.72 in
17	0 in	12	1.01 in	8	1.68 in
18	0 in	13	1.63 in	9	0.41 in
19	0.01 in	15	0.48 in	10	0.88 in
20	0 in	16	0.79 in	11	0.13 in
21	0 in	17	1.53 in	12	0.64 in
22	0.01 in	18	0.11 in	13	0.25 in
23	0.4 in	19	0.07 in	14	0 in
24	0 in	20	0.01 in	15	0 in

Weather History for Swantown Marina

Downloaded from <https://www.wunderground.com/personal-weather-station/dashboard?ID=KWAOLYMP8#history/>

Precipitation Data

16	0.01 in	10	0.01 in	4	0.29 in
17	0.99 in	11	0.16 in	5	0.5 in
18	0.57 in	12	0.11 in	6	0.2 in
19	0.03 in	13	0.08 in	7	0 in
20	0.37 in	14	0 in	8	0 in
21	0.78 in	15	0.17 in	9	0 in
22	0.37 in	16	0.64 in	10	0.04 in
23	0.55 in	17	0.28 in	11	0.37 in
24	0.14 in	18	0.08 in	12	0.5 in
25	0.02 in	19	0.29 in	13	0.67 in
26	0 in	20	0.45 in	14	0.23 in
27	0.42 in	21	1.39 in	15	0.19 in
28	0.05 in	22	0.17 in	16	0.1 in
29	0 in	23	0.36 in	17	0.31 in
30	0.01 in	24	0 in	18	0.18 in
31	0.01 in	25	0 in	19	0.55 in
<hr/>		26	0.04 in	20	0.18 in
2016	Precip. Accum.	27	0.78 in	21	0.17 in
<hr/>		28	0.64 in	22	0.06 in
Jan	Sum	29	0.5 in	23	0 in
1	0 in	30	0.05 in	24	0 in
2	0.01 in	31	0.02 in	25	0.01 in
3	0.02 in	<hr/>		26	0.17 in
4	0.26 in	2016	Precip. Accum.	27	0.12 in
5	0.11 in	<hr/>		28	0.46 in
6	0.01 in	Feb	Sum	29	0.22 in
7	0.01 in	1	0.01 in	<hr/>	
8	0 in	2	0.05 in	2016	Precip. Accum.
9	0 in	3	0.39 in	<hr/>	

Precipitation Data

Mar	Sum	29	0 in	23	0.03 in
1	1.43 in	30	0 in	24	0.07 in
2	0.23 in	31	0 in	25	0 in
3	0.11 in	2016	Precip. Accum.	26	0 in
4	0.22 in			27	0 in
5	0.21 in	Apr	Sum	28	0 in
6	0.69 in	1	0 in	29	0.02 in
7	0.31 in	2	0 in	30	0 in
8	0.12 in	3	0.22 in	2016	Precip. Accum.
9	1.18 in	4	0.17 in		
10	0.44 in	5	0.01 in	May	Sum
11	0.26 in	6	0 in	1	0 in
12	0.29 in	7	0 in	2	0 in
13	0.43 in	8	0 in	3	0 in
14	0.62 in	9	0 in	4	0.01 in
15	0.07 in	10	0 in	5	0 in
16	0 in	11	0 in	6	0 in
17	0 in	12	0.45 in	7	0 in
18	0 in	13	0.23 in	8	0 in
19	0 in	14	0.14 in	9	0.01 in
20	0.31 in	15	0.01 in	10	0 in
21	0.43 in	16	0 in	11	0 in
22	0.05 in	17	0 in	12	0 in
23	0.29 in	18	0 in	13	0 in
24	0.32 in	19	0 in	14	0 in
25	0 in	20	0 in	15	0.01 in
26	0.26 in	21	0 in	16	0 in
27	0.1 in	22	0.25 in	17	0 in
28	0 in				

Precipitation Data

18	0 in	12	0 in	7	0.11 in
19	0.01 in	13	0.04 in	8	0.11 in
20	0 in	14	0.35 in	9	0.09 in
21	0.12 in	15	0.01 in	10	0.01 in
22	0.01 in	16	0 in	11	0 in
23	0 in	17	0.05 in	12	0 in
24	0 in	18	0 in	13	0 in
25	0 in	19	0 in	14	0 in
26	0 in	20	0.01 in	15	0 in
27	0 in	21	0 in	16	0 in
28	0.06 in	22	0.05 in	17	0 in
29	0 in	23	0.42 in	18	0 in
30	0 in	24	0.01 in	19	0 in
31	0 in	25	0 in	20	0 in
<hr/>		26	0 in	21	0 in
2016	Precip. Accum.	27	0 in	22	0.02 in
<hr/>		28	0 in	23	0 in
Jun	Sum	29	0 in	24	0 in
1	0.08 in	30	0 in	25	0 in
2	0 in	<hr/>		26	0 in
3	0 in	2016	Precip. Accum.	27	0 in
4	0 in	<hr/>		28	0 in
5	0 in	Jul	Sum	29	0 in
6	0 in	1	0 in	30	0 in
7	0 in	2	0 in	31	0 in
8	0 in	3	0 in	<hr/>	
9	0.17 in	4	0 in	2016	Precip. Accum.
10	0.48 in	5	0 in	<hr/>	
11	0 in	6	0 in	Aug	Sum
				<hr/>	

Precipitation Data

1	0 in	31	0.12 in	25	0 in
2	0 in	2016	Precip. Accum.	26	0 in
3	0 in			27	0.01 in
4	0 in	Sep	Sum	28	0 in
5	0 in			29	0 in
6	0 in	1	0.34 in	30	0 in
7	0.13 in	2	0.03 in	2016	Precip. Accum.
8	0 in	3	0 in		
9	0 in	4	0.03 in	Oct	Sum
10	0 in	5	0.04 in		
11	0 in	6	0.3 in	1	0.2 in
12	0 in	7	0 in	2	0.1 in
13	0 in	8	0 in	3	0.02 in
14	0 in	9	0 in	4	0.23 in
15	0 in	10	0 in	5	0.16 in
16	0 in	11	0 in	6	0.33 in
17	0 in	12	0 in	7	0.43 in
18	0 in	13	0 in	8	0.58 in
19	0 in	14	0 in	9	0.3 in
20	0 in	15	0 in	10	0 in
21	0 in	16	0 in	11	0 in
22	0 in	17	0.34 in	12	0.05 in
23	0 in	18	0.01 in	13	1.69 in
24	0 in	19	0.18 in	14	1.64 in
25	0 in	20	0 in	15	0.77 in
26	0 in	21	0.01 in	16	0.76 in
27	0 in	22	0 in	17	0.44 in
29	0 in	23	0.28 in	18	0.2 in
30	0 in	24	0 in	19	0.42 in

Weather History for Swantown Marina

Downloaded from <https://www.wunderground.com/personal-weather-station/dashboard?ID=KWAOLYMP8#history/>

Precipitation Data

20	1.14 in	14	0.64 in	9	0.7 in
21	0.3 in	15	1.02 in	10	0.53 in
22	0.09 in	16	0.09 in	11	0.53 in
23	0.01 in	17	0 in	12	0.11 in
24	0.05 in	18	0.04 in	13	0 in
25	0.02 in	19	0.12 in	14	0 in
26	1.06 in	20	0.14 in	15	0.04 in
27	0.03 in	21	0.15 in	16	0 in
28	0.01 in	22	0.48 in	17	0 in
29	0.06 in	23	0.5 in	18	0 in
30	0.37 in	24	1.6 in	19	1.07 in
31	0.55 in	25	0.13 in	20	0.26 in
<hr/>		26	0.76 in	21	0 in
2016	Precip. Accum.	27	0.4 in	22	0.16 in
<hr/>		28	0 in	23	0.84 in
Nov	Sum	29	0.08 in	24	0 in
1	0.24 in	30	0.42 in	25	0 in
2	0.48 in	<hr/>		26	0.81 in
3	0.01 in	2016	Precip. Accum.	27	0.2 in
4	0.04 in	<hr/>		28	0 in
5	0.95 in	Dec	Sum	29	0.08 in
6	0.11 in	1	0 in	30	0 in
7	0.09 in	2	0.36 in	31	0.11 in
8	0.01 in	3	0.43 in	<hr/>	
9	0.08 in	4	0.13 in	2017	Precip. Accum.
10	0.01 in	5	0.25 in	<hr/>	
11	0.01 in	6	0.01 in	Jan	Sum
12	0.49 in	7	0.01 in	1	0.14 in
13	0.62 in	8	0 in	2	0 in

Precipitation Data

3	0 in	2017	Precip. Accum.	26	0.4 in
4	0 in			27	0.13 in
5	0 in	Feb	Sum	28	0.07 in
6	0 in			2017	Precip. Accum.
7	0 in	1	0 in		
8	0.61 in	2	0.02 in	Mar	Sum
9	0.05 in	3	0.56 in		
10	0.3 in	4	0.87 in	1	0.14 in
11	0 in	5	0.38 in	2	0.46 in
12	0 in	6	0.67 in	3	1.03 in
13	0 in	7	0.01 in	4	0.32 in
14	0 in	8	0.95 in	5	0.22 in
15	0 in	9	1.29 in	6	0.23 in
16	0 in	10	0.2 in	7	0.74 in
17	1.16 in	11	0.01 in	8	0.27 in
18	0.69 in	12	0.01 in	9	1.01 in
19	0.15 in	13	0 in	10	0.05 in
20	0.04 in	14	0.49 in	11	0.41 in
21	0.18 in	15	1.32 in	12	0.01 in
22	0.06 in	16	0.12 in	13	0.45 in
23	0 in	17	0.02 in	14	0.87 in
24	0 in	18	0.36 in	15	0.68 in
25	0 in	19	0.27 in	16	0.01 in
26	0 in	20	0.26 in	17	1.01 in
27	0 in	21	0.13 in	18	0.42 in
28	0 in	22	0 in	19	0 in
29	0.02 in	23	0.16 in	20	0.09 in
30	0 in	24	0 in	21	0.15 in
31	0 in	25	0.01 in	22	0.23 in

Precipitation Data

23	0.43 in
24	0.42 in
25	0.09 in
26	0.53 in
27	0.03 in
28	0.54 in
29	0.71 in
30	0.06 in
31	0 in

2017	Precip. Accum.
------	-------------------

Apr	Sum
-----	-----

1	0.01 in
2	0 in
3	0 in